

Minnesota Attorney General: Administrative Rules Proceedings

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August 20, 2018

267

Robert T. Holley
Special Assistant
Attorney General
Health

October 18, 1976

- Chi 3, 4 and 5

ADMIN 1000

STATE OF MINNESOTA

DEPARTMENT ATTORNEY GENERAL-Health

Office Memorandum

TO : Mr. Michael Miller
Special Assistant
Attorney General
Dept. of Administration

DATE: Sept. 24, 1976

FROM : Robert T. Holley RTH
Special Assistant
Attorney General

PHONE:

SUBJECT: Submission for Approval of Chiropractic Board Fee Rule

Attached for your review and approval is a proposed rule of the Minnesota State Board of Chiropractic Examiners which would increase annual license renewal fees from $25.00 to $50.00.

The Board's statutory authority to promulgate the rule is set forth at Minn. Laws 1976, ch. 222 § 3 and Minn. Stat. § 148.07 subd. 1 (1974) as amended by Minn. Laws 1976, ch. 222 § 48.

The rule is rather simple and there were no changes, substantive or otherwise, subsequent to the public hearing.

Please note that I am also enclosing copies of citizen letter correspondence between myself and a Dr. Robert Fitzgerald. Dr. Fitzgerald was the sole public or non-agency person who attended the public hearing in this matter. And although his letter to this office was not received until after the twenty-day open record period, it is included here in the interest of providing you with all arguably pertinent material bearing upon the proposed rule.

Your earliest review of the proposed rule would be appreciated. Please call me if there are any questions.

RTH:mt

RECEIVED
SEP 2 4 1976
Dept. of Administration

MINNESOTA STATE BOARD
OF CHIROPRACTIC EXAMINERS

PROPOSED NEW RULE RE:
LICENSE RENEWAL FEES

The following new Rule is proposed:

CHAPTER TWO: FEES

Chi 3 (Reserved for future use.)
Chi 4 (Reserved for future use.)
Chi 5 Individual Annual License Renewal

(a) Thirty (30) or more days before January 1 each year, the State Board of Chiropractic Examiners (hereinafter "Board") shall mail to the last address on file with the Board a license renewal fee notice to each person (hereinafter "licensee") licensed to practice chiropractic within this state.

(b) The license of each licensee shall expire at midnight on December 31 each year. The Board shall renew the license upon receipt from the licensee of a license renewal fee of $50.00, plus any applicable penalty fee as set forth in (c) below. Each licensee shall submit the license renewal fee to the Board no later than January 1 of the year for which the license renewal is requested.

(c) A licensee shall submit to the Board, in addition to the license renewal fee, a penalty fee of $5.00 per month for each month or portion thereof for which the license renewal fee is in arrears, such penalty not to exceed $50.00.

This rule shall apply to license renewal effective January 1, 1977, or anytime thereafter.

APPROVED AS TO FORM AND LEGALITY
OCT 14 19
/s/ Michael B. Miller

STATE OF MINNESOTA
DEPARTMENT OF STATE
FILED
OCT 14 1976 - 3:10 pm
Joan Anderson Growe
Secretary of State

STATE OF MINNESOTA
OFFICE OF HEARINGS EXAMINERS

FOR THE BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees.

REPORT OF HEARING EXAMINER

The above-entitled matter came on for hearing before Hearing Examiner Peter C. Erickson of the Minnesota Office of Hearing Examiners on June 30, 1976 at 1:30 p.m. in the Board Room of the Department of Health Building, Minneapolis, Minnesota.

Robert T. Holley, Special Assistant Attorney General, 717 Delaware Street S. E., MMinneapolis, Minnesota - 55440, appeared as counsel for the State Board of Chiropractic Examiners. E. I. Puckropp, Secretary-Treasurer of the Board, and Marie Anderson testified on behalf of the Board. The hearing continued until all interested groups or persons had an opportunity to be heard concerning the adoption of the proposed rules.

Pursuant to Minn. Stat. § 15.052, subd. 3 (1975 Supp.), this report will include Findings of Fact, Conclusions and Recommendations. The Board of Chiropractic Examiners and the Office of Hearing Examiners will make a copy of this Report available for review to any interested person upon request. Copies of the Report will be furnished at a nominal cost.

The Board shall, if it proposes to adopt the rules as originally proposed or amended, submit the complete hearing record to the Chief Hearing Examiner, pursuant to HE 108, no earlier than ten days subsequent to the receipt of this Report. It shall include the rules as originally proposed, and the rules as proposed for adoption in final form. The submission to the Chief Hearing Examiner shall precede review by the Attorney General. The Chief Hearing Examiner shall complete his review and submit his report to the Board on the issue of substantial changes in the rule within ten calendar days. The Board will be responsible

for filing the rules with the Attorney General.

Based upon the proceedings herein, the Examiner makes the following:

FINDINGS OF FACT

1. On April 28, 1976, the Board filed the following documents with the Chief Hearing Examiner:

(a) A proposed Order for Hearing;

(b) A proposed Notice of Hearing with the proposed rules attached; and

(c) A statement of the number of persons expected to attend and estimated length of hearing.

2. On May 26, 1976, the Board mailed the Notice of Hearing to all persons and associations who had registered their names with the Secretary of State for the purpose of receiving such notice, to all persons and associations on a list maintained by the Board of Chiropractic Examiners, and to all members of the Legislature.

3. On June 7, 1976, the Board filed with the Office of Hearings Examiners the following documents:

(a) The Order for Hearing;

(b) The Notice of Hearing as mailed;

(c) The affidavit of receipt of the Secretary of State's list;

(d) The Affidavit of Mailing;

(e) The Statement of Need;

(f) The affidavit of mailing of a notice pursuant to Minn. Stat. § 15.0412, subd. 6, a copy of the Notice and material received pursuant to the Notice.

(g) The names of Board personnel who will represent the agency.

(h) A summary of evidence.

(i) Department of Finance Approval.

The documents were available for inspection at the office of Hearings Examiners from the date of filing to the date of the hearing.

4. The record was closed after allowing 20 days for submission of written comments at the end of the day on July 20, 1976.

5. Statutory authority to promulgate the proposed rule is found in Minn. Stat. § 148.07, subd. 1 (1974), as amended by Minn. Laws 1976, Ch. 222, § 48, and in Minn. Laws 1976, Ch. 22, § 3.

6. The need to adopt this rule arises by reason of the Board's inability to fully meet, from total fees presently collected, its anticipated operating expenses for fiscal year 1977. Pursuant to Minn. Laws 1976, Ch. 222, § 3, such fees shall be adjusted in "a sufficient amount so that the total fees collected . . . will as closely as possible equal anticipated expenditures." Thus, unless fees are now increased, the Board will be without sufficient operating funds and unable to comply with the foregoing legislative directive.

7. As is demonstrated in the Fee Analysis Statement, the Board operated at a $5,000 deficit in fiscal year 1976. Without the proposed increase in renewal fees, said deficit would nearly triple in fiscal 1977. Thus, the amount of increase, dictated by legislative directive, is necessitated by the Board's present financial condition and expenditure and revenue estimates for fiscal year 1977. Moreover, because renewal fees must be paid by every licensed chiropractor and generate the largest source of Board revenue, limiting a fee increase at this time to license renewals only results in the most equitable distribution of the increase.

8. The proposed rule would not alter existing statutory monthly penalty fee amounts, the existing total maximum penalty fee, the current due date for the Board's receipt of license renewal payments, nor the Board's present responsibility to annually provide for due date notice. The sole change presented by the proposed rule is an increase in annual license renewal

fees, from $25 to $50, which, given the Board's current financial status, is necessary to fulfill the aforementioned new directives of the Legislature.

9. Dr. Bob Fitzgerald, a Minneapolis chiropractor, gave testimony alleging past misuse of funds and faulty record keeping by the Chiropractic Board. State audit reports and newspaper articles were submitted in support of these charges. Dr. Fitzgerald testified that it is the misuse of funds which has created the current financial position of the Board and that no increase in fees is justified. Marie Anderson, new financial advisor to the Board, testified that any past fund misuse and record-keeping problem the Board may have had is being corrected.

CONCLUSIONS

1. Due, timely and adequate legal notice of the hearing was properly served and filed by the Board of Chiropractic-Examiners. Although the 25-day filings (see HE 103) were filed two days late, no persons were prejudiced by the delay, as none requested an opportunity to review them, which is the purpose for the prefiling requirement. All other substantive and procedural requirements of statute or rule have been complied with.

2. The Examiner accepts the good-faith efforts of the Board to correct any financial problems it may have had and to continue operations in an appropriate manner.

3. The need for and reasonableness of the proposed rule have been demonstrated by the Board.

4. The Board has documented its statutory authority to promulgate the proposed rule.

RECOMMENDATION

That the Board of Chiropractic Examiners adopt the rule as proposed.

Dated this 28th day of July, 1976.

Peter C. Erickson

PETER C. ERICKSON
Hearing Examiner

STATEMENT OF COMPLIANCE WITH

MANUAL OF RULE MAKING PROCEDURES

I, Special Assistant Attorney General, Robert T. Holley, do hereby declare that I have examined the proposed rules relating to the State Board of Chiropractic Examiners license renewal fee increase and all related documents and that, based on them and my personal familiarity with the applicable procedures, the Manual of Rule Making Procedures has been followed.

Dated: September 24, 1976

Robert T. Holley

ROBERT T. HOLLEY
Special Assistant
Attorney General

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE

BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

CERTIFICATE OF BOARD'S ADOPTION OF RULE RESOLUTION

I, Edward I. Puckropp, D.C., do hereby certify that I am the Executive Secretary of the State Board of Chiropractic Examiners, a board duly authorized under the laws of the State of Minnesota, and that the following is a true, complete, and correct copy of a resolution adopted at a meeting of the State Board of Chiropractic Examiners duly and properly called and held on the 19th day of August, 1976; that a quorum was present at said meeting; that a majority of those present voted for the resolution; that said resolution is set forth in the minutes of said meeting and has not been rescinded or modified.

> "RESOLVED, that, pursuant to authority vested in us by Minn. Laws, ch. 222 § 3 and Minn. Stat. § 148.07 subd. 1 (1974) as amended by Minn. Laws 1976, ch. 222 § 48, the rule relating to an increase in annual chiropractic license renewal fees (CHI 5) be and hereby is approved and adopted and in its originally proposed form and without any change or amendment by this body; further, that Report of Hearing Examiner herein, dated the 28th day of July, 1976, be and hereby is adopted, except that, to the extent adverse inferences respecting the Board may be drawn thereform, we do not adopt Paragraph 9 of the Findings of Fact on Page 4 of said Report."

IN WITNESS WHEREOF, I have hereunto subscribed my name this 31 day of August, 1976.

MINNESOTA STATE BOARD
OF CHIROPRACTIC EXAMINERS

E. I. Puckropp D.C.

EDWARD I. PUCKROPP, D.C.
Executive Secretary

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE

BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

ORDER ADOPTING RULE

The above-entitled matter came on for hearing before the Minnesota State Board of Chiropractic Examiners on the 30th day of June, 1976, at 1:30 p.m. in the Board Room, Minnesota Department of Health Building, 717 Delaware Street S.E., Minneapolis, Minnesota 55440, after proper notice required by Minn. Stat. § 15.0412 (Supp. 1975) was served upon all persons, associations and other interested groups registered with the Secretary of State for that purpose.

After affording interested persons an opportunity to present written and oral data, statements and arguments, and having heard and considered all of the testimony and evidence adduced and upon the records, files and proceedings herein, and applicable statutory standards or criteria, and having confirmed the need for the above-captioned rules.

NOW, THEREFORE, IT IS ORDERED that these rules identified as CHI 5 Individual Annual License Renewal are adopted this 24 day of September, 1976, pursuant to authority vested in this Board by Minn. Laws 1976, ch. 222 § 3 and Minn. Stat. § 148.07 subd. 1 (1974) as amended by Minn. Laws 1976, ch. 222 § 48, and by resolution of the Minnesota State Board of Chiropractic Examiners duly adopted at a meeting of the said Board on the 19th day of August, 1976.

MINNESOTA STATE

BOARD OF CHIROPRACTIC EXAMINERS

E. I. Puckropp D.C.

EDWARD I. PUCKROPP, D.C.
Executive Secretary

BEFORE THE OFFICE OF HEARING EXAMINERS

OF THE STATE OF MINNESOTA

A P P E A R A N C E S

PLACE Board of Health Bldg

DATE 6/30/76 DOCKET NO.

IN THE MATTER OF

NAME (Print, please) E. I. Pocketropp

ADDRESS 1305 Lowry Ave N.E.

CITY Mpls STATE Minn.

ZIP 55418

APPEARING FOR Chiropractic Brd of Examiners

STATUS: Applicant, Protestant, Petitioner, Respondent, other

BEFORE THE OFFICE OF HEARING EXAMINERS

OF THE STATE OF MINNESOTA

A P P E A R A N C E S

PLACE Board of Health Bldg

DATE 6/30/76 DOCKET NO.

IN THE MATTER OF

NAME (Print, please) E. I. Pocktopp

ADDRESS 2305 Lowry Ave N.E.

CITY Mpls STATE Mn.

ZIP 55418

APPEARING FOR Chiropractic Brd of Examiners

STATUS: Applicant, Protestant, Petitioner, Respondent, other

BEFORE THE OFFICE OF HEARING EXAMINERS

OF THE STATE OF MINNESOTA

A P P E A R A N C E S

PLACE Board of Health Bldg

DATE 6/30/76 DOCKET NO.

IN THE MATTER OF

NAME (Print, please) E.I. Pockropp

ADDRESS 1305 Lowry Ave N.E.

CITY Mpls STATE Minn

ZIP 55418

APPEARING FOR Chiropractic Brd of Examiners

STATUS: Applicant, Protestant, Petitioner, Respondent, other

HP-76-002-PE

STATE OF MINNESOTA
OFFICE OF HEARING EXAMINERS

FOR THE BOARD OF CHIROPRACTIC EXAMINERS

IN THE MATTER OF THE PROPOSED ADOPTION OF A RULE OF THE STATE BOARD OF CHIROPRACTIC EXAMINERS RELATED TO LICENSE RENEWAL FEES.

REPORT OF THE ACTING CHIEF HEARING EXAMINER

WHEREAS, a hearing was held on June 30, 1976, before Peter C. Erickson, a Hearing Examiner of the State Office of Hearing Examiners, on the above-entitled matter in compliance with Minn. Stat. §15.0412, Subd. 4; and

WHEREAS, the Report of Hearing Examiner made pursuant to Minn. Stat. §15.052, Subd. 3, was issued to the Board of Chiropractic Examiners on July 28, 1976; and

WHEREAS, the Board of Chiropractic Examiners has now determined to adopt rules pursuant to Minn. Stat. §15.0412, Subd. 4; and

WHEREAS, the Board of Chiropractic Examiners has submitted said rules to the Acting Chief Hearing Examiner for review pursuant to Minn. Stat. §15.052, Subd. 4, and Rule HE 107; and

WHEREAS, the Acting Chief Hearing Examiner finds that there are no substantial changes in said rules as originally proposed.

NOW, THEREFORE, upon receipt of this Report, the Board of Chiropractic Examiners has the responsibility of submitting the complete hearing record and the rules as adopted by the Department to the Attorney General and to publish in the State Register, all pursuant to Minn. Stat. §15.0412, Subd. 4.

Dated this 9th day of September, 1976.

Duane R. Harves

DUANE R. HARVES
Acting Chief Hearing Examiner

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

ORDER FOR HEARING

To effectively implement Minn. Stat. § 148.07 subd. 1 (1974), as amended by Minn. Laws 1976, ch. 222, § 48, the Minnesota State Board of Chiropractic Examiners deems it necessary to consider adoption of the proposed rule captioned above pursuant to the authority vested in it by the above-referenced statute, and Minn. Laws 1976, ch. 222, § 3.

IT IS HEREBY ORDERED that a public hearing on the above-captioned proposed rule be held in the Board Room, Minnesota Health Department Building, 717 Delaware Street S.E., Minneapolis, Minnesota on June 30, 1976, commencing at 1:30 p.m. and continuing until all interested persons have had an opportunity to be heard.

IT IS FURTHER ORDERED that a Notice of Hearing be mailed to all persons or representatives of associations or other interested groups who have registered their names with the Secretary of State for that purpose.

Dated: May 25, 1976

MINNESOTA STATE BOARD
OF CHIROPRACTIC EXAMINERS

E. I. Puckropp D.C.

EDWARD I. PUCKROPP, D.C.
Secretary-Treasurer

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE

BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

CERTIFICATE OF BOARD'S AUTHORIZING RESOLUTION

I, EDWARD PUCKROPP, do hereby certify that I am Secretary-Treasurer of the Minnesota State Board of Chiropractic Examiners, a Board duly authorized under the laws of the State of Minnesota, and that the following is a true, complete and correct copy of the motion passed at a meeting of the Minnesota State Board of Chiropractic Examiners duly and properly called and held on the 7th day of March, 1976; that all the Board members were present at said meeting, that said motion was unanimously passed by the Board, is set forth in the minutes of the meeting, and has not been rescinded or modified.

> RESOLVED, that Edward Puckropp, D.C., Executive Secretary of the Minnesota State Board of Chiropractic Examiners, be and he hereby is granted the authority and directed to call a hearing for the purpose of promulgating rules of the Board relating to fees for annual renewal of licenses as well as perform any and all acts incidental thereto, including but without being limited thereto, signing an order for hearing and notice of hearing.

In Witness Whereof, I have hereunto subscribed my name this 25 day of May, 1976.

MINNESOTA STATE BOARD OF CHIROPRACTIC EXAMINERS

E. J. Puckropp D.C.

EDWARD I. PUCKROPP, D.C.
Secretary-Treasurer

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE

BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

AFFIDAVIT OF RECEIPT OF THE SECRETARY OF STATE'S LIST

Robert T. Holley, being duly sworn on oath, deposes and says:

1) That he is an employee of the Office of the Attorney General for the State of Minnesota and legal counsel for the Minnesota State Board of Chiropractic Examiners.

2) That on or about the 13th day of May, 1976, he telephoned the Secretary of State's Office for the State of Minnesota and requested a current list of all representatives of associations or other interested groups or persons who had registered their names with the Secretary of State for the purpose of obtaining notices of public hearings relating to the promulgation of rules pursuant to M.S. 15.0412.

3) That on the 17th day of May, 1976, in response to the above request, the Secretary of State provided him with such a list, a copy of which is attached hereto and incorporated by reference.

Further affiant sayeth not.

Robert T. Holley

Subscribed and sworn to before me
this 3rd day of June, 1976.
Marie B. Tromiczak

MARIE B. TROMICZAK
NOTARY PUBLIC - MINNESOTA
HENNEPIN COUNTY
My Commission expires Oct. 9, 1980

STATE OF MINNESOTA

COUNTY OF RAMSEY

In the Matter of the Proposed
Rules Relating to Board of
Chiropractic Examiners:
License Renewal Fees

CERTIFICATE

I hereby certify that the 482 general labels and one page list for the Minnesota State Board of Chiropractic Examiners all of which are attached and made a part hereof, constitute the complete lists of persons, associations, and other interested groups who as of 10:30 o'clock A .M., this 17th day of May, 1976, have requested pursuant to Minn. Stat. § 15.0412 subd. 4 (Supp. 1975) that their names be placed on file with the Secretary of State for the purpose of receiving notice of public hearing on proposed rules on the subject captioned above.

Joan Anderson Growe
SECRETARY OF STATE

JOAN ANDERSON GROWE

By Ail Dean

ALBERT,AA CALDER CORP
366 JACKSON ST
ST PAUL MN
55101

ALLENDORF MARSHALL
220 GRAIN EX 400 S 4TH
MPLS MN
55415

AMER CAMPING ASSN
3639-21/2 ST N.E.
MPLS MN
55418

AM INST PROF GEOLOGISTS
2201 PRINCETON AVE
ST PAUL MN
55105

ANCHOR BLOCK COMPANY
PO BOX 3360
ST PAUL MN
55165

ANDERSON GRAHAM
951 E HENN
MPLS MN
55414

ANDERSON HERBERT
418 8TH ST. SO.
VIRGINIA MN
55792

ANDERSON HAROLD
BOX 3047
MANKATO MN
56001

ANDERSON JAMES
7703 NORMANDALE RD
MPLS MN
55435

ANDERSON MARY
4425 RUTLEDGE AVE
EDINA MN
55436

ANDERSON STANFORD P
14600 MINNETONKA BLVD
MINNETONKA MN
55343

ANTHONY DICK WDSM RADIO
230 E SUPR ST
DULUTH MN
55102

ARNOLD ROBERT MESPA
41 SHERBURNE
ST PAUL MN
55103

ARROWHEAD REGIONAL DEV COMM
200 ARROWHEAD PLACE
DULUTH MN
55802

ARVER JOHN A
2467 COHANCY
ST PAUL MN
55113

ASMUSSEN,DENNIS,MDIRG
3036 UNIV AVE SE
MPLS MN
55414

ASSOCIATED GEN CONTROF MN
48 E 8TH STREET
ST PAUL MN
55101

ASSOCIATED INDUST OF MPLS
NATIONAL BLDG
MPLS MN
55402

ASSN OF MINN COUNTIES
55 SHERBURNE AVE #203
ST PAUL MN
55103

ASSN RESIDENCES FOR RETARDED
459 RICE SUITE 301
ST PAUL MN
55103

AUTOMOBILE MFRS ASSN INC
55 SHERBURNE AVE
ST PAUL MN
55103

BABCOCK LOCHER NELSON ET
118 E MAIN ST
ANOKA MN
55303

BADALICH JOHN P
2025 THOMPSON AVE
SO ST PAUL MN
55075

BARRETT FRED
ST LOUIS CO COURT HOUSE
DULUTH MN

BARTHOLOW HAROLD E FIRE CHF
2600 109 AVE N W
COON RAPIDS MN
55433

BATES DENNIS
446 STATE OFF BLDG
ST PAUL MN
55155

BECK PAT
953 HYACINTH AVE
ST PAUL MN
55106

BECKLIN ROBERT C
447 N W 4TH
CAMBRIDGE MN
55008

BEECHER EVERETT
10 10 1ST ST SO
HOPKINS MN

BEGALKA D REV
212 N ELK ST
BELLE PLAINE MN
56011

BEMIDJI STATE COLLEGE
PLACEMENT BUR.J.C.BRADY
BEMIDJI MN
56601

BENSONI PETER USW OF AM.
609 PROVIDENCE BLDG.
DULUTH MN

BERGERUD ALF
300 ROANOKE BLDG
MPLS MN
55402

BERGSETH THOMAS
1011 NICOLLET MALL
MPLS MN
55403

BERGUSON & LOEGREN
MN GAS 700 LINDEN W
MPLS MN
55403

BEST FLANAGAN ET AL
4040 IDS CENTER
MPLS MN
55402

BEUTEL ROBERT
2200 SILVER LAKE RD
NEW BRIGHTON MN
55112

BLOMQUIST BARRY L
NORTH BRANCH MN
55056

BLOOMINGTON CITY CLERK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

BOLTON MALCOLM
422 ALDRICH AVE NO
MPLS MN
55405

BUEHL JAMES W
332 HAMM BLDG
ST PAUL MN
55102

BRICK PHILIP D
807 SELLWOOD BLDG
DULUTH MN
55802

BRIGGS & MORGAN - R F FRIEL
2200 W 1ST NATL BK BLDG
ST PAUL MN
55101

BRIGHAM E M III
RR4
RED WING MN
55066

BROEKER JOHN
2850METRO DR. SUITE 504
BLOOMINGTON MN
55420

BROOKS WILLIAM F JR
E54 MIDLAND BK BLDG
MPLS MN
55401

BROWN D M GOODRIDGE PUB SCH
IND DIST #561
GOODRIDGE MN
56725

BROWN H D
4961 KINGSBERRY LANE
MINNETONKA MN
55343

BRUBACHER RICHARD COMM ADM
208 ADM BLDG
ST PAUL MN
55101

BRUNING C.R.DEPT.CLINIC.E
BURTON HALL
MPLS. MN
55455

BUCHHOLTZ CHARLES
5044 BRENT AVE E
INV GRV HTS MN
55075

BURGER ALBERT
600 DEGREE OF HONOR BLD
ST PAUL MN
55101

BUR.ENGR.IND.DIV. MR.KIBIGER
219 N. 2ND ST.
MPLS. MN

BUR NATL AFFAIRS INC
1231 25TH ST NW
WASHINGTON DC
20037

BUSCH NOEL
3131 FERNBROOK LANE N
MPLS MN
55441

CABLE COMM SYST-H SARRAZIN
BOX 777
HECTOR MN
55342

CAIN RUTH
730 E 38TH ST
MPLS MN
55407

CAIRNS JOHN A
47TH FLR IDS CENTER
MPLS MN
55402

CAPITOL NEWS SERVICE
BOX 17035
ST PAUL MN
55117

CARLSON CARL L
7516 80TH ST S
COTTAGE GROVE MN
55016

CARLSON VERNE E
BOX 755 CITY HALL
WILLMAR MN
56201

CARRISON DALE K
MANKATO STATE COLLEGE
MANKATO MN
56001

CENTRAL BUSINESS DATA
BENSON RADIO ARCADE BLD
BENSON MN
56215

CENTRAL MN REGIONAL DEV COMM
1139 FRANKLIN AVE
SAUK RAPIDS MN
56379

CHAMBER OF COMMERCE
30 SO 1ST AVE EAST
ELY MN
55731

CHAMBERLAIN JOHN L
PO BOX 241
MPLS MN
55440

CHERCHES CHRIS CITY MGR
5005 MTKA BLVD
ST LOUIS PARK MN
55416

CHRISTIAN SCI COMM ON PUB
1821 UNIV AVE SUITE 271
ST PAUL MN
55104

CHRISTIANSEN FREDRIK
RM 505 CAPITOL SQ BLDG
ST PAUL MN
55155

CHRYSALIS CENTER FOR WOMEN
2104 STEVENS AVE S
MPLS MN
55404

CITY CLERK
386 CITY HALL
ST PAUL MN
55102

CITIZENS LEAGUE
530 SYNDICATE BLDG
MPLS MN
55402

CITY OF ROBBINSDALE
C LARSON 4221 LAKE RD
ROBBINSDALE MN
55422

CLARKSON J.B.
2350 I.D.S. CENTER
MINNEAPOLIS MN
55402

CLAUSEN PHILLIP
2307 STANDISH ST
ST PAUL MN
55108

CLAWSON CONNIE
HELP CT 317-17TH AV SE
MPLS MN

COLEMAN NICHOLAS D
700 LINWOOD AVE
ST PAUL MN
55105

COLLIN LAURENCE
RT 2
ISANTI MN
55040

COMMUNITY DESIGN CENTER
118 E 26TH ST
MPLS MN
55404

CONCORDIA COLLEGE
DEAN
MOORHEAD MN
56560

CONSUMER SERVICES DEPT CO
5TH FLR METRO SQ BLDG
ST PAUL MN
55101

COUNTY ATTYS COUNCIL
95 SHERBURNE AVE S203
ST PAUL MN
55103

CRAVEN NORMAN
10637 THOMAS AVE S
BLOOMINGTON MN
55431

CROW WING CO PLANNING & ADV
COURT HOUSE
BRAINERD MN
56401

CUSHMAN J S DAYTON HUDSON
700 NICOLLET MALL
MPLS MN
55402

DAHLKE LOIS M
118 S EAGLE ST
BELLE PLAINE MN
56011

DANIELSON RODNEY L
418 AUDITORIUM
ST PAUL MN
55102

DIEHL JOHN
26 KENWOOD PKWY
ST PAUL MN
55105

DOW CHEMICAL
47 BLDG
MIDLAND MI
49640

DZUGAN KEN ST PAUL PLANNING
421 WABASHA ST
ST PAUL MN
55102

ELDRED R W ARMOUR & CO
UNION STOCK YARDS
SO ST PAUL MN
55075

ENNIS A F BOISE CASCADE
PO BOX 713
INTL FALLS MN
56649

ESSE KENNETH
4801 W 50TH ST
EDINA MN
55424

EWALD DOUGLAS MINN HOSP ASSN
2333 UNIV AVE SE
MPLS MN
55414

FARMERS ELEVATOR ASSN
852 GRAIN EXCH BLDG
MPLS MN
55415

FINLEY JAMES F
920 MINN BLDG
ST PAUL MN
55101

FLEMING FREDERICK A
1860 HIGHLAND PARKWAY
ST PAUL MN
55116

DAYTON CHAS SIERRA CLUB
800 MIDLAND BANK BLDG
MPLS MN
55401

DISPATCH PIONEER PRESS
PRESS RM STATE CAPITOL
ST PAUL MN
55101

DOYTON MAURICE, MET SEWER BD
350 METRO SQ BLDG
ST PAUL MN
55101

ELMER EDWIN W
2901 PLEASANT AVE
MPLS MN
55408

ENV SERV-GEN RESOURCE CORP
6340 INDUSTRIAL DR
HOPKINS MN
55343

ETHICS COMM
RM 410 STATE OFF BLDG
ST PAUL MN
55155

EWING MRS WM
42 ASTAR RD
BARRITT MN
55706

FARRELL FRANK BUR NOR
RM 1180 176 E 5TH ST
ST PAUL MN
55101

FINNEGAN J.R.
55 E. 4TH
ST. PAUL MN
55101

FLADLAND CLINT MN L&P BUR
795 RAYMOND AVE
ST PAUL MN
55114

DAILEY THOMAS ECONOMICS LAB
370 WABASHA ST
ST PAUL MN
55102

DEVELOP DISABILITIES PROGRAM
STATE PLAN 101 CAP SQ
ST PAUL MN
55155

DORSEY MARQUART
2400 1ST NATL BANK BLDG
MPLS MN
55402

DUDLEY E H
RT 7 BOX 122
EXCELSIOR MN
55331

EBELING EDWARD H.
161 W. MAIN
PERHAM MN
56573

EMERICK RICHARD A
1908 IDS CENTER
MPLS MN
55402

ERDMAN ROGER TENNANT CO
701 N LILAC DR
MPLS MN
55441

EVANS CHAS.L. PRENTICE-HALL
ENGELWOOD CLIFFS
NEW JERSEY

FELHABER R S
W 1ST NATL BANK BLDG
ST PAUL MN
55101

FITZGERALD DR BOB
3007 LYNDALE AVE SO
MPLS MN
55408

FORBES GORDON MINN RRS ASSN
203 HANOVER 480 CEDAR
ST PAUL MN
55101

DANKERS,KENNETH
1200 WEST FOURTH STREET
RED WING MN
55066

DICKINSON MRS JOANNE
BOX 1065
MARSHALL MN
56258

DOUGLAS BELL ET AL
2212 AM.NATL BK BLDG
ST PAUL MN
55102

DUNN CLIVER PLUMBERS LOC
708 SC 10TH ST
MPLS MN
55404

ELDER DR JAMES B
11140 WASHBURN AVE SO
BLOOMINGTON MN
55431

ENGELBRECHT DOUGLAS
809 RANGE ST
NO MANKATO MN
56001

ERNEST K LEHMANN & ASSOC.
1409 WILLOW ST.
MPLS MN
55403

EVERETT JERRY NW PETRO AS
512 NICOLLET MALL RM917
MPLS MN
55402

FAEGRE & BENSON ATTN LIBR
1300 NW BANK BLDG
MPLS MN
55402

FILTER LOREN
BOX 36
BRITT MN
55701

FLADLAND CLINTON MN L&P B
796 RAYMOND AVE
ST PAUL MN
55114

FORSBERG AGR SERV
518 SUMMIT AVE
NEW ULM MN
56073

FOX A.C. LINDQUIST & VENNUM
4200 IDSCTR 80 S.8TH ST
MINNEAPOLIS MN
55402

F W WOOLWORTH CO
3316 W 66TH ST
EDINA MN
55424

GEBERT K L
220 GRAIN EXCH
MPLS MN
55415

GLEN. HILLS HOSP.R.VAN HAUER
3901 GOLDEN VALLEY RD.
MPLS. MN
55422

GRANATH MARVIN -HONEYWELL
2701 4TH AVE SO
MPLS MN
55408

GREEN JANET
9773 N SHORE DR
DULUTH MN
55804

HAROLD J WESTIN CONSTRUCTORS
45 E 8TH ST
ST PAUL MN
55101

HAYES, THOMAS W
700 SELLWOOD BLG
DULUTH MN
55812

HARTFELDT WILL
434 HAMM BLDG
ST PAUL MN
55102

HEARING EX.OFF. M GREENBERG
1745 UNIV AVE
ST PAUL MN
55104

HENDRICKSON A WM
100 FREEMAN DRIVE
ST PETER MN
56082

FRANKLIN ROBERT B MPLS TRIB
426 PORTLAND
MPLS MN
55415

GEO A HORMEL & CO LAW DEPT
PO BOX 800
AUSTIN MN
55912

GODIN RALPH J
3824 47TH AVE SO
MPLS MN
55406

GREATER MET AREA HOSPITALITY
5152 CEDAR AVE S
MPLS MN
55417

GRUMMERT REV DONALD
1435 ADAMS ST
MPLS MN
55413

H B FULLER CO
2400 KASOTA AVE
ST PAUL MN
55108

HARVEY MICHAEL
1390 W MINNEHAHA PKWY
MPLS MN
55409

HEALTH MANPOWER C LARSON
717 DELAWARE ST SE
MPLS MN
55440

HEIM PAUL
1320 SOO LINE BLDG
MPLS MN
55402

HICHINGER-MARK PLANNING
421 WABASHA ST
ST PAUL MN
55102

FREDIN CONRAD M
811 FIRST NATL BK BLDG
DULUTH MN
55802

GALVIN M J JR
W2162 1ST NATL BK BLDG
ST PAUL MN
55101

GIEL DAVID
RM B-28 STATE CAPITOL
ST PAUL MN
55155

GOODMAN DF TEL CABLE TV
302 E SUPERIOR
DULUTH MN
55802

GREEN DEL CITY MGR
BLOOMINGTON CITY HALL
BLOOMINGTON MN
55431

GUSTAFSON DAN-LABOR TEMPLE
312 CENTRAL
MPLS MN
55414

HANFT PHILIP M
1200 ALWORTH BLDG
DULUTH MN
55802

HALLBERG LEE & MCCARE
4927 34TH AVE S
MPLS MN
55417

HENTHORN GARY WOODSTOCK
7365 LANDAU DR
BLOOMINGTON MN
55438

HEAD & TRUHN
1007 SOO LINE BLDG
MPLS MN
55402

HEINTZ MARY ELLEN
PO BOX 595
CINCINNATI OH
45201

HILL JIM ASSOC.MILK PROD.
7850 METRO PARKWAY
MINNEAPOLIS MN
55420

FREDRIKSON BYRON ET AL
47TH FLR IDS CENTER M
MPLS MN
55402

GARDNER HOW - R A JOHNSON
515 WASHINGTON AVE N
MPLS MN
55401

GLEESON MICHAEL
909 SCC SC BLDG U OF M
MPLS MN
55455

GRAHAM THOS H
854 MIDLAND BK BLDG
MPLS MN
55401

GREEN GARY J
41 SHERBURNE AVE
ST PAUL MN
55102

GUSTAFSON WALLACE
BOX 567
WILLMAR MN
56201

HANSON ETHEL
2813 85TH AVE N
MPLS MN
55444

HAUN DR J W GEN MILLS
PO BOX 1113
MPLS MN
55440

HART PATRICK V
112 E LIBERTY BOX 3271
MANKATO MN
56001

HEANEY BILL
30 W SUPERIOR ST
DULUTH MN
55802

HEISENFELT WM
BOX 516
BEMIDJI MN
56601

HINRICHSEN PATRICK
MANKATO FREE PRESS
MANKATO MN
56001

HOLDAHL SCOTT
380 N BLDG GRAIN EXCH
MPLS MN
55415

HORNER WALDORF - KAZIUKEWICZ
PO BOX 3260
ST PAUL MN
55165

HOUSE RESEARCH
RM 17 STATE CAPITOL
ST PAUL MN
55155

HUMAN SERVICES
414 LAFAYETTE RD 5THFL
ST PAUL MN
55101

HYLAND DEAN
1501 W 50TH ST
MPLS MN
55419

INGVALSON VERN MN.FARM BUR.
3110 WOODDALE DR PO 337
OST PAUL MN
55165

IVERSON DR JOS DEPT ED
ST OLAF COLLEGE
NORTHFIELD MN
55057

JAIN NIRMAL ENIV PROCESS
1220 GLENWOOD AVE
MPLS MN
55405

JENSEN MRS GAYNOLD
111 WEST 107TH ST
MPLS MN
55420

JOHNSON LEROY
9939 BLUEBIRD ST NW
COON RAPIDS MN
55433

KABLE RICHARD W

BETHEL MN
55006

KELLY DANILE
3549 V2 PLEASANT AVE
MPLS MN
55408

HOLEY GEO AERONAUTICS
DOWNTOWN AIRPORT
ST PAUL MN
55107

HOULE MELVIN
881 W HWY 96
SHOREVIEW MN
55112

HULSTRAND ANDERSON & LARSON
PO BOX 130
WILLMAR MN
56201

HUNT JAMES P JR
11470 GALTIER DR
BURNSVILLE MN
55378

IAS FED OF MINN
902 SOO LINE BLDG
MPLS MN
55402

IZAAK WALTON MN DIV
111 E FRANKLIN RM-210
MPLS MN
55404

JENCS INC
525 LAKE AVE SO
DULUTH MN
55801

JOHANSEN BUS SERV INC
19 DAYTON RD
CHAMPLIN MN
55316

JOHNSON M.D. FRUNDT & FRUNDT

BLUE EARTH MN
56013

KAVANEY RICHARD
1220 NORTHERN FED BLDG
ST PAUL MN
55102

KIMBALL ROBERT
647 CAPITOL SQ BLDG
ST PAUL MN
55101

HOLMES EUSTIS ET AL
4610 IDS CENTER
MPLS MN
55402

HOUSE APPROPRIATIONS COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HULTMAN WARREN R
C/O BARBAROSSA R3
OSSEO MN
55369

HUTCHISON R.M. ANOKA CO.COMP
COURT HOUSE
ANOKA MN
55303

ILLINGWORTH ROBERT C
6750 FRANCE AVE S RM290
MPLS MN

INTERSTATE POWER RW STEELE
1000 MAIN ST
DUBUQUE IA
52001

JENSEN ARTHUR,CITY CLK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

JOHNSON & SANDERSON
ST MARYS HOSPITAL
ROCHESTER MN
55901

JOHNSON LANCE J
265 S LAFAYETTE RD
ST PAUL MN
55107

KEARLE MIKE
909 6TH AVE N
ST CLOUD MN
56301

KJERVIK DIANE
4302 POWEL HALL U OF M
MPLS MN

HOPKINS WM.R. DIR.MISCCA
3915 GOLDEN VALLEY ROAD
GOLDEN VALLEY MN
55422

HOUSE ED STANDING SUB COM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HUMAN RIGHTS
200 CAPITOL SC BLDG
ST PAUL MN
55101

HYDROLOGIST
CHIPPEWA NATL FOREST
CASS LAKE MN
56633

INGEBRIGTSEN DR K H
23 SE 4TH ST
MPLS MN
55414

IUOE LOC 49 CHAS SWENSON
2580 UNIV AVE
ST PAUL MN
55101

JACKMAN DONALD G
4023 E LAKE ST
MPLS MN
55406

JENSEN CARL A
127 E MAIN ST
SLEEPY EYE MN
56085

JOHNSON CLARENCE IBEW LU
3615 37TH AVE S
MPLS MN
55406

KEENAN RICHARD J
4444 IDS BLDG
MPLS MN
55402

KLOSTER MARION PEAVEY CO
730 2ND AVE S
MPLS MN
55402

KLIP STEVEN J
1910 1ST NATL BK BLDG
MPLS MN
55402

KNAPP J A
RM 3 CAPITOL
ST PAUL MN
5515

KNAPP TIMOTHY
COLLEGE FORESTRY U OF M
ST PAUL MN
55108

KNIGHT DR KEITH,PROFESSOR
ST CLOUD STATE
ST CLOUD MN
56301

KNUTSON R N GRANNIS ETAL
F J SCHULT BLDG
ST ST PAUL MN
55075

KNUDSON ROBT
4375 BROWNDALE AVE
MPLS MN
55424

KOLLER MR & MRS ERWIN A
1568 DULUTH ST
ST PAUL MN
55108

KOPP MRS VERNON
2050 65TH ST E
INVER GR HGHT MN
55075

KRAMER ERNEST W
717 DELAWARE ST SE
MPLS MN
55440

KROEGER CHARLES
122 NW 7TH STREET
FAIRMALLT MN
55021

KRONLOKKEN J E
10048 NORD RD
BLOOMINGTON MN
55437

KROON H CLIFTON
210 E WALNUT
MANKATO MN
56001

KUHL CARL
4421 4TH ST NE
COL HEIGHTS MN
55421

KVR ENGINEERING INC
600 S CO RD 18
MPLS MN
55426

LABELLE JUANITA MRS
5816 AQUILA AVE NO
NEW HOPE MN
55428

LAKE SUPERIOR INDUSTRIAL BUR
828 FIRST AM. BK. BLDG.
DULUTH MN
55802

LANAHAN E F - SIBLEY CO
184 E 6TH ST
ST PAUL MN
55101

LANGVIN DAVID
7500 80TH ST S
COTTAGE GROVE MN
55016

LANSING & OAKES
400 SIBLEY ST
ST PAUL MN
55101

LAPP LAZAR LAURIE ET AL
1200 BUILDERS EXCHANGE
MINNEAPOLIS MN
55402

LARSON C L
3800 MINNEHAHA AVE SO
MPLS MN
55406

LARSON HANS P DIV HOSP SERV
717 DELAWARE ST SE
MPLS MN
55440

LEAGUE MN MUNIC
300 HANOVER 480 CEDAR
ST PAUL MN
55101

LEAGUE WOMEN VOTERS OF MINN
555 WABASHA
ST PAUL MN
55102

LEG.REF.LIB-Z. DEWITT
RM 111 STATE CAPITOL
ST PAUL MN
55155

LIBBEY LEONARD
BOX 17011 NOKOMIS STA
MPLS MN
55417

LINDALL & JONATHAN DEVELO
VILLAGE ONE CENTER
CHASKA MN
55318

LOCKNER GARY
R R 1 BOX 23
BAUDETTE MN
56623

LOOS CALVIN J
6809 LYNDALE AVE SO
MPLS MN
55423

LOWE DOUG
2701 N LEXINGTON AVE
ROSEVILLE MN
55113

LYNCH DONALD SIBLEY CO
184 E 6TH ST
ST PAUL MN
55102

MANSFIELD LARRY
HCARC 22 27TH AVE SE
MPLS MN
55414

MCDONALD PHILIP M
2077 SELBY AVE
ST PAUL MN
55104

MCFADDEN G H DISPATCH-PR
55 E 4TH ST
ST PAUL MN
55101

MCKIBBON MRS SHIRLEY
11 EVERGREEN LN
BABBITT MN
55706

MCLELLAN LARKIN
215 ADM BLDG ST CAPITOL
ST PAUL MN
55101

MALONE E I COMM LABOR & I
444 LAFAYETTE RD 5TH FL
ST PAUL MN
55101

MANKATO STAT STUDENT SENATE
CENTENNIAL STUDENT UN
MANKATO MN
56001

MANKATO STATE STUDENT ASSN
BOX 58 MANKATO COLLEGE
MANKATO MN
56001

MANTHEY T J PICKANDS MATHER
1100 SUPERIOR AVE
CLEVELAND OH
44114

MAPPINAN MARGARET M
1117 COMMERCE BLDG
ST PAUL MN
55101

MASTOR & MATTSON LTD
315 PEAVEY BLDG
MPLS MN
55402

MAUL WARREN E
320 S 4TH ST
MPLS MN
55415

MAYO FOUNDATION G ORWOLL
200 FIRST AVE NW
ROCHESTER MN
55901

MECCA
867 GRAND AVE
ST PAUL MN
55105

METEROTTO, JOAN
1794 SO LEXINGTON
ST PAUL MN
55118

MEYER HERBERT
10824 ZENITH AVE S
BLOOMINGTON MN
55431

MINN RETAIL FED INS
131 METRO SP
ST PAUL MN
55101

MPLS TRIBUNE CITY DESK
425 PORTLAND AVE
MPLS MN
55415

MN. ASN.C&IND H.D.PETERSON
480 CEDAR ST.
ST.PAUL MN
55101

MN STATE SER BLIND-K NATARDY
1745 UNIVERSITY AVE
ST PAUL MN
55104

MINN. ASSN. PET RETAILERS
1115 2ND AVE. SO.
MINNEAPOLIS MN
55403

MINN COMMUNITY DEVELOP SERV
512 POSSMOR BLDG
ST PAUL MN
55101

MINN ENV LAW INST INC
PO BOX 15076 COMM STA
MPLS MN
55415

MINN. HOTEL & MTR. ASSN
2001 UNIVERSITY AVE
ST PAUL MN

MINN LP GAS ASSN
7515 WAYZATA BLVD 106
MPLS MN
55426

MINN POULTRY & HATCHERY ASSN
BOX 158
MADELIA MN
56062

MERRITT GRANT POLLUTION CONT
1935 W CO RD 32
ROSEVILLE MN
55113

MIDLAND GLASS- HD SPURLING
PO BOX 69
SHAKOPEE MN
55379

MPLS CHAMBER COMM TRANSP DPT
15 S 5TH ST
MPLS MN
55402

MIDLAND GLASS-HD SPURLING
PO BOX 69
SHAKOPEE MN
55379

MN AFL-CIO L.D. LASHOMB
175 AURORA
ST PAUL MN
55103

MINN ASPHALT PAVEMENT ASSN
555 WABASHA RM 209
ST PAUL MN
55102

MINN ASSN WATERSHED DIST'S

ADA MN
56510

MINN COUNCIL STATE EMP NO 6
475 RICE ST
ST PAUL MN
55103

MINN FARMERS UNION PRES OFF
1275 UNIV AVE
ST PAUL MN
55104

MINN HOUSING INST N T CARTER
7801 METRO PKWY
MPLS MN
55420

MINNE MINE CREDIT UNION
3000 HUDSON PK S 100
ST PAUL MN
55119

MN REP STATE CENTRAL COMM
555 WABASHA AVE
ST PAUL MN
55102

MET TER MEN ASSN A ROSENTHAL
1821 UNIV AVE
ST PAUL MN
55104

MILLER RICHARD A
1020 PLYMOUTH BLDG
MPLS MN
55402

MILLER PAUL J PHARMACY SERV
ST MARYS HOSP
ROCHESTER MN
55901

MN.BD OF NURSING
717 DELAWARE ST SE
MPLS MN
55414

MINN ASSN COOPERATIVES
55 SHERBURNE AVE
ST PAUL MN
55103

MINN AUTOMOBILE DEALERS ASSN
GRIGGS MIDWAY BLDG
ST PAUL MN
55104

MINN DEPT HEALTH J C MCKASY
717 DELAWARE S E
MPLS MN
55440

MINN FOOD RETAILERS ASSN
555 WABASHA
ST PAUL MN
55101

MINN HWYS MANAGEMENT SERVICE
407 HWY BLDG
ST PAUL MN
55101

MINN.MTR.TRANSP. .J.N.DENN
1821 UNIV.
ST.PAUL MN
55104

MINN RESTAURANT ASSN
2001 UNIVERSITY AVE.
ST PAUL MN 55
104

METROPOLITAN COUNCIL LIBR
300 METRO SQUARE
ST PAUL MN
55155

MILLER TOM
2311 PILLSBURY AVE S
MPLS MN
55404

MPLS STAR PRESS ROOM
STATE CAPITOL
ST PAUL MN
55101

MINN APT ASSN
GRIGGS-MIDWAY BLDG
ST PAUL MN
55104

MN SOC SERV ASS J HOOD
614 PORTLAND
ST PAUL MN
55102

MINN ASSN ELEC COOPERATIV
4901 W 77TH ST
MPLS MN
55435

MINN COMM FOR HANDICAPPED
METRO SQ 492 7TH & ROBT
ST PAUL MN
55101

MINN DENTAL HYGIENISTS
5041 YVONNE TERRACE
MPLS MN
55436

MINN HEREFORD-LJ SCHAFER

BUFFALO LAKE MN
55314

MINN LAND USE COMMITTEE
4344 IDS CENTER
MPLS MN
55402

MINN PETROLEUM COUNCIL
1020 NORTHERN FED BLDG
ST PAUL MN
55102

MINN RETAIL HARDWARE ASSN
3033 EXCELSIOR BLVD 313
MPLS MN
55416

MINN SOCIETY ARCHITECTS AIA
NW NATL BK BLDG
ST PAUL MN
55101

MINN STATE CAPITOL EMP UNION
PO BOX 3215
ST PAUL MN
55165

MINN TBR PRODUCERS ASSN
200 CHRISTIE BLDG
DULUTH MN
55802

MINN-WISC BOUNDARY AREA COMM
800 2ND ST
HUDSON WI
54016

MOOD R BLOOMINGTON HLTH DEPT
10200 PENN SO
BLOOMINGTON MN
55431

NATL CAR RENTAL ATT D MITZEL
5501 GREEN VALLEY DR
MPLS MN
55437

NCEC INC C/O DR DAHLBERG
CONCORDIA COLLEGE
MOORHEAD MN
56560

NIELSEN STOCK & BLACKBURN
415 730 BLDG
MPLS MN

NURSING HOME ADMRS BD EXAMRS
RM 340 717 DELAWARE SE
MPLS MN
55414

O'BRIEN J.DENNIS
1100 1ST NATL.BANK BLDG
MINNEAPOLIS MN
55402

OSTRUM DONALD E
PO BOX 33163
COON RAPIDS MN
55433

MINN SOC CERTIFIED PUB ACCTS
1102 WESLEY TEMPLE BLDG
MPLS MN
55403

MINN STATE MED ASSN
375 JACKSON ST
ST PAUL MN
55101

MINN.TURKEY GROWERS ASSN
2393 UNIV AVE
ST PAUL MN
55114

MN ELECTRICAL ASSN
3100 HUMBOLT SO
MPLS MN
55408

MURPHY DIANA E
4200 IDS-LINDQUIST VENN
MPLS MN
55402

NATL COUNCIL JEWISH WOMEN
4330 CEDAR LK RD
MPLS MN
55416

NEDELL HAROLD - MEINEKE
6300 W LOOP S SUITE 200
BELLAIRE TX
77401

NO SUB MONTESSORI-S SADDLER
2487 HELEN COURT
NO ST PAUL MN
55109

NUTTER JULIA
743 W MONTANA
ST PAUL MN
55117

OFFICE OF THE GOVERNOR
130 STATE CAPITOL
ST PAUL MN
55101

OTTER TAIL POWER CO.
215 S. CASCADE ST.
FERGUS FALLS MN
56537

MINN STATE BAR ASSN
100 MINN FED BLDG
MPLS MN
55402

MINN STATE RETIREMENT SYSTEM
529 JACKSON ST
ST PAUL MN
55101

MINN VETERANS MED ASSN
2175 W HWY 36
ROSEVILLE MN
55113

MN PUB INT RESEARCH GROUP
3036 UNIV AVE SE
MPLS MN
55414

MORTON BUILDINGS INC
R #1
FOLEY MN
56329

NATL FAMILY INS CO
2147 UNIV AVE
ST PAUL MN
55114

NEREN MADONNA
376 NEAL AVE S
AFTON MN
55001

NORTH CENTRAL ELEC ASSN
PO BOX 202
BATTLE LAKE MN
56515

NW BELL TEL CO LEGAL DEPT
224 S 5TH ST RM 2000
MPLS MN
55402

OLD COLONY GAS & OIL COMPANY
17TH AVE N AT 2ND ST
MPLS MN
55411

MINN STATE [illegible]
717 DELAWARE ST SE #351
MPLS MN
55414

MINN TEAMSTERS CREDIT UNI
2021 HENN AVE E
MPLS MN
55413

MINN WATER RESOURCES BD
RM 206 555 WABASHA ST
ST PAUL MN
55102

MOFFITT R C
RM 301 M MPLS CITYHALL
MPLS MN
55415

MPIRG
BOX 45 ST MARYS COLLEGE
WINONA MN
55987

NASS GEO V HENN CC CEN PC
5TH AND PORTLAND AVE
MPLS MN
55415

NAT'L SOLID WASTES-R. GRA
1730 RHODE ISLAND AV.NW
WASHINGTON DC
20036

NEUMAN RALPH W
RT 2 BOX 125
EMBARRASS MN
55732

NW COUNTRY ELEVATOR ASSN
802 GRAIN EXCH BLDG
MPLS MN
55415

NYQUIST DEAN A
3707 53RD PL N
BROOKLYN CTR MN
55429

OLOFSON ARTHUR MBC & MAI
527 SCO LINE BLDG
MPLS MN
55402

PATTISON ORVIS
BOX 645
WILLMAR MN
56201

PAYNE COL ALVIN
DEGRAFF MN
56233

PEETSER AND SHULTZ, INC
1433 UTICA AVE S
MPLS MN
55416

PERPICH PETER S
314 MINN BLDG
ST PAUL MN
55101

PESS DONALD G
6801 SHINGLE CREEK PKWY
BROOKLYN CTR MN
55430

PULSCHER RBT SPRINGSTED INC
813 OSBORN BLDG
ST PAUL MN
55102

RANALLO CLARENCE
800 CENTRAL AVE N E
MPLS MN
55413

REARDON MRS HELEN
1125 S E 6TH ST
WILLMAR MN
56201

RENNER R.H. ST PAUL AREA CC
300 OSBORN BLDG.
ST PAUL MN
55102

RIEKE DAVID R
P O BX 509
THIEF RIV FLS MN
56701

ROSS ALFRED
6356 WARE RD
LINO LAKES MN
55014

SAN SIMEON DEVELOP CORP
OLD 1ST STATE BK BLDG
PAYNESVILLE MN

ST PAUL ASSN PLBG HTG MECH
614 AM NATL BK
ST PAUL MN

PAYNE WM R
2400 FIRST NATL BK BLDG
MPLS MN
55402

PHAR MFGRS ASSN WM D PATTON
1155 15TH ST NW
WASHINGTON DC DC
20005

PORTER LYLE O
TRACY MN
56175

POYZER ROBT
BOX 675
FERGUS FALLS MN
56357

REDMOND CARL STORES INC
215 E EXCELSIOR AVE
HOPKINS MN
55343

REMQUIST ARTHUR NSP CO
414 NICOLLET MALL
MPLS MN
55401

ROE DAVID
175 AURORA
ST PAUL MN
55102

ROSS ROY J
CLK TREAS
LITCHFIELD MN
55355

SANFORD S M
7000 PORTLAND AVE
RICHFIELD MN
55423

ST PAUL PUR HLTH DR P COX
555 CEDAR ST
ST PAUL MN
55101

PETERSEN JOHN W
510 NW BK BLDG
ST PAUL MN
55101

PHILLIPS LEGISLATIVE SERVICE
459 RICE ST
ST PAUL MN
55103

PORT AUTH CITY OF ST PAUL
330 MINNESOTA BLDG
ST PAUL MN
55101

PRAUSE JOS.C.
2220 105TH AVE.N.W.
COON RAPIDS MN
55433

RAUENHORST CORP-C ANDERSON
7900 XERXES S. S-2200
MPLS MN
55431

REID DAVID H
5633 WASHBURN AVE S
MPLS MN
55410

RICHARDSON THOS
7851 METRO PKWY S 103
MPLS MN
55420

ROBBIE JOSEPH
904 CARGILL BLDG NO CTR
MPLS MN
55402

RUDY FLOYD
118 AVE C
CLOQUET MN
55720

SATHRE, HARVEY
375 MARION STREET
ST PAUL MN
55103

ST PAUL FOOD RETAILERS ASSN
1220 ARCADE
ST PAUL MN
55106

PETERSEN CATY
854 MIDLAND BK BLDG
MPLS MN
55401

PINNETTI NICK M HALEY & A
40 CENTRAL PARK S
NEW YORK NY
10019

PORTER DAVID
3212 LONGFELLOW AVE S
MPLS MN
55407

PROCTER&GAMBLE L THECHAR
IVORYDALE TECH CENTER
CINCINNATI OH
45217

RADMAN RICHARD-LABOR TEMP
418 AUDITORIUM
ST PAUL MN
55102

REAGAN MICHAEL
% MINN LEARNING CTR
BRAINERD MN
56401

REINC C LAINE 3M COMPANY
3M CENTER
ST PAUL MN
55101

RICHARDS MONTGOMERY ET AL
1430 RAND TOWER
MPLS MN
55402

ROBERTS DAVID E
1260 NW NATL BK BLDG
ST PAUL MN
55101

SAX DOVE & STENSON
310 ENDICOTT BLDG
ST PAUL MN
55101

SCARBOROUGH WILLIAM
DIV.ED. U.M.
MORRIS MN
56267

SCHLICHT REV ROBT
611 W MAIN ST
BELLE PLAINE MN
56011

SCHNEIDER MAHLON
GREEN GIANT
LESUEUR MN
56058

SCHWINN ROBT.P.
1400 SOO LINE BLDG.
MPLS. MN
55402

SENATE COUN OFF ROOM 24
STATE CAPITOL
ST PAUL MN
55101

SHARP BOB
4125 HIGHWOOD RD
ST LOUIS PK MN
55416

SLOCUM CHARLES A
1203 IDS TOWER
MPLS MN
55402

SNYDER ROBERT W
248 CO B U OF M
ST PAUL MN
55101

STATE BD.BARBER EXAMINERS
555 WABASHA
ST PAUL MN
55102

STATE REGISTER,MORROW S.
203,95 SHERBURNE
ST PAUL MN
55103

STUPKA & MOREM
MIDTOWN BLDG
AUSTIN MN
55912

SWANSON BURT E
W-2162 1ST NATL BK BLDG
ST PAUL MN
55101

SWEITZER R L HONEYWELL INC
2701 4TH AVE S
MPLS MN
55408

SCHMIDT E R MN ASSN REALTORS
6101 WAYZATA BLVD
MPLS MN
55416

SCHUTZ LINDA
RM 328 CAPITOL BLDG
ST PAUL MN
55155

SCHNEIDER & NEESER
706 1ST ST SO PO BX 876
WILLMAR MN
56201

SENATE FINANCE COMMITTEE
113 STATE CAPITOL
ST PAUL MN
55101

SHAW ROBERT M
616 MOBIL OIL BLDG
MPLS MN
55402

SMERIKA WM.
BOISE CASCADE PAPERS
INTL FALLS MN
56649

SODERBERG HAROLD J
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

STATE BD VETERINARY EXAMINER
C/O DR A C SPANNAUS DVM
WACONIA MN

STD AM LIFE & ANNUITY CO
3801 W 50TH ST
MPLS MN
55410

SULLIVAN J KIRK
PO BOX 200
BOISE ID
83701

SWANSON DALE
P O BOX 339
FOREST LAKE MN
55025

SCHMIDT H W TCHRS RETIREMENT
302 CAPITOL SQ BLDG
ST PAUL MN
55101

SCHWARTAU NEAL METH HOSP
201 W CENTER ST
ROCHESTER MN
55901

SCHROEDER ALFRED H
2172 CARROLL AVE
ST PAUL MN
55104

SENATE GOV OP COMM
RM 303 STATE CAPITOL
ST PAUL MN
55155

SHELL OIL CO. W.A. ROQUET
ONE SHELL PLAZA BX 2463
HOUSTON TX
77001

SMITH MICHAEL
1423 NEWTON AVE N
MPLS MN
55411

SODERMAN ANTHONY
152 S. PLAZA BLDG
MPLS MN
55416

STATE&FED ASSOC
1101 15TH ST NW_S.309
WASHINGTON DC
20005

STEELWORKERS CREDIT UNION
BOX 250
BABBITT MN
55706

SUMMIT NATL BANK D L MORRILL
205 AURORA AVE
ST PAUL MN
55103

SWANSON GERALD H
212 CITY HALL
ROCHESTER MN
55901

TATE VERN 3M CO
3M CENTER 220/6W
ST PAUL MN
55101

SCHMIDT LARRY WCCO-TV NEW
50 S 9TH ST
MPLS MN
55402

SCHWERMAN EARL JR
1535 8TH AVE SE
ROCHESTER MN
55901

SELECTVISION INC FR VALEN
245 PARK AVE
NEW YORK NY
10017

SHABATURA EUGENE H
2833 LAKE AVE SO
DULUTH MN
55811

SITE ENGINEERS INC
900 REDWELL LANE
APPLE VALLEY MN
55124

SNELL LYN
BOX 314
EDEN VALLEY MN
55329

STANSFIELD ARLENE LAND O
PO BOX 116
MPLS MN
55440

STATE & FED ASSOCIATES
1101 15TH ST NW S 309
WASHINGTON DC
20005

STOLPESTAD BROWN & SMITH
1550 NW BK BLDG
ST PAUL MN
55101

SUSSEL CO.ATTN:TED SCHWEN
1850 COMO AVE.
ST PAUL MN
55108

SWANSON MORTIMER C
5824 FRANCE AVE S
EDINA MN
55410

THOMPSON CONRAD
1107 23RD ST NW
ROCHESTER MN
55901

THOMPSON HESSIAN ET AL
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

TIMESAVERS INC ATT R S VOLD
5270 HANSON COURT
MPLS MN
55422

UNION STOCK YARDS
ATTN PRES
SC ST PAUL MN
55075

TOUCHE ROSS & CO K H STOCKE
780 NORTHSTAR CNTR
MPLS MN
55402

TWIN CITY RETAIL DRUGGIST
2388 UNIV AVE
ST PAUL MN
55104

VANDERVCORT T J MET WASTE
350 METRO SQUARE BLDG
ST PAUL MN
55101

VAN CLEVE JOHN H
2101 HENN AVE
MPLS MN
55405

VAN DRAKE STEPHEN R
BOX 353
PELICAN RAPID MN
56572

VAN EVERA MUNDT ET AL
700 TORREY BLDG
DULUTH MN
55802

VERRILL JOHN E
DEPT SECONDARY ED UOF M
DULUTH MN
55812

VILLAGE OF WOODBURY
2100 RADIO DRIVE
WOODBURY MN
55042

VOLDNESS PERRY
IDS 8TH & MARQUETTE
MPLS MN
55402

VOSS REV GORDON O
11120 NE 7TH ST
BLAINE MN
55434

VOS LEROY
2137 BURNS AVE
ST PAUL MN
55119

WALD JEAN
5746 SANDER DR
MPLS MN
55417

WALTERS THOS H
4510 W 77TH ST STE 235
MPLS MN
55435

WANQUIST ALLEN
RM 252 FEDERAL BLDG
ST PAUL MN
55101

WELK G V NORTHERN STATES
414 NICOLLET MALL
MPLS MN
55401

WELLINGTON R R SKELLY OIL
PO BOX 1650
TULSA OK
75102

WESTIN CHAS W
220 MEDICAL ARTS BLDG
DULUTH MN
55802

WHITING RALPH
555 WABASHA SUITE 204
ST PAUL MN
55102

WHITLOCK A G
ECON LAB OSBORN BLDG
ST PAUL MN
55102

WILCOX J PATRICK
1220 NORTHERN FED BLDG
ST PAUL MN
55102

WM.MITCHEL COLLEGE LAW LIB.
2100 SUMMIT AVE.
ST.PAUL MN
55105

WILEY ENTERPRISES
101 5TH AVE SE
OSSEO MN
55369

WILLIAMS THOS W
4915 W 35TH ST
MPLS MN
55416

WILSON R GARY PPG INDUSTR
1 GATEWAY CENTER
PITTSBURGH PA
15222

WIS FEEDER PIG MARKET CO-OP

FRANCIS CREEK WI

WOLKERSTORFER THEODORE
676 17TH AVE NW
NEW BRIGHTON MN
55112

WOZNIAK D D
401 FIRST FED BLDG
ST PAUL MN
55101

WYANT CLINTON W ATTY

ATKIN MN
56431

YOUNG TODD P
555 WABASHA STE 215
ST PAUL MN
55102

Autrey, James, 117 SE 4th St., Minneapolis 14.

ALLENDORF MARSHALL
220 GRAIN EX 400 S 4TH

AMER CARPING ASSN
3639-21/2 ST N.E.
MPLS

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE

BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

AFFIDAVIT OF MAILING

Sharon Schuster, being first duly sworn, deposes and says:

That on the 26th day of May, 1976, at the City of Minneapolis, County of Hennepin, State of Minnesota, she served the attached Notice of Hearing by depositing in the United States mail at said City of Minneapolis, a true and correct copy thereof, properly enveloped, with postage prepaid, to all persons and associations at the addresses listed on the attached Certificate of the Secretary of State.

Sharon Schuster

Subscribed and sworn to before me this 26th day of May, 1976.

Frank J. Bigham

FRANK J. BIGHAM
Notary Public, Ramsey Co. Mn.
MY COMMISSION EXPIRES
May 16, 1980

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

STATEMENT OF NEED

The above-captioned rule is not an amendment to existing rules of the State Board of Chiropractic Examiners (hereinafter "Board").

The need to adopt this rule arises by reason of the Board's inability to fully meet from total fees presently collected its anticipated operating expenses for fiscal year 1977. Pursuant to Minn. Laws 1976, ch. 222, § 3, such fees shall be adjusted in "a sufficient amount so that the total fees collected . . . will as closely as possible equal anticipated expenditures." Thus, unless fees are now increased, the Board will be without sufficient operating funds and unable to comply with the foregoing legislative directive.

Specific authority for the Board's adjustment by rule of license renewal and penalty, among other fees, as well as procedural requirements associated therewith, is also set forth in Minn. Laws 1976, ch. 222, § 3. Such authority is further established under § 48 of said 1976 legislation, wherein all references to specific dollar amounts relating to license renewal and penalties under Minn. Stat. 148.07, subd. 1 (1974) are deleted, such amounts to hereafter be "set by the board."

The proposed rule would not alter existing statutory monthly penalty fee amounts, the existing total maximum penalty fee, the current due date for the Board's receipt of license renewal payments, nor the Board's present responsibility to annually provide for due date notice. The sole change

presented by the proposed rule is an increase in annual license renewal fees, which, given the Board's current financial status, is necessary to fulfill the aforementioned new directives of the Legislature.

MINNESOTA STATE BOARD OF
CHIROPRACTIC EXAMINERS

Dated: May 25, 1976.

E. I. Puckropp D.C.
EDWARD I. PUCKROPP, D.C.
Secretary-Treasurer

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE

BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

NOTICE OF HEARING

NOTICE IS HEREBY GIVEN that a public hearing in the above-entitled matter will be held in the Board Room, Minnesota Health Department Building, 717 Delaware Street S.E., Minneapolis, Minnesota, on June 30, 1976, commencing at 1:30 P.M. and continuing until all interested persons have had an opportunity to be heard.

All interested or affected persons will have an opportunity to participate. Statement may be made orally and written materials may be submitted at hearing. In addition, written materials may be submitted by mail to Mr. Peter C. Erickson, Hearing Examiner, at Room 300, 1745 University Avenue, St. Paul, Minnesota 55104, (612)296-8118, either before the hearing or within 20 days after the close of the hearing.

A copy of the proposed rule is attached and made a part hereof. Additional copies are now available and may be obtained by writing Edward I. Puckropp, D.C., Secretary-Treasurer, Minnesota State Board of Chiropractic Examiners, 717 Delaware Street S.E., Minneapolis, Minnesota 55440. Copies will also be available at the door on the date of the hearing.

The Minnesota State Board of Chiropractic Examiners' authority to promulgate the proposed rule is contained in Minn. Laws, ch. 222, § 3 and Minn. Stat. § 148.07 subd. 1 (1974) as amended by Minn. Laws 1976, ch. 222, § 48.

A "statement of need" explaining why the State Board of Chiropractic Examiners feels the proposed rule is necessary will be filed with the Hearing Examiner's Office at least 25 days prior to the hearing and will be available there for public inspection.

Testimony or other evidence to be submitted for consideration should be pertinent to the matter at hand and may be presented either orally or in writing at the public hearing or by mailing a statement to the Secretary-Treasurer of the State Board of Chiropractic Examiners, address as above. If the person submitting a statement cannot be present to read his statement at the time of the hearing, the statement will be entered into the record. For those wishing to submit written statements or exhibits, it is requested that at least three copies of such statement, exhibit or summary be furnished at the hearing. The record will remain open for receipt of briefs or other written material relative to the proposed rule for 20 days subsequent to the public hearing.

It is suggested that to save time and avoid duplication, those organizations or associations having a common viewpoint or interest in these proceedings join together where possible and present a single statement in behalf of such interests.

Also, please be advised that pursuant to Minn. Stat. § 10A.01, subd. 11 (1974) any individual engaged for pay or other consideration for the purpose of representing persons or associations attempting to influence administrative action, such as the promulgation of this rule, must register with the State Ethics Commission as a lobbyist within 5 days of the commencement of such activity by the individual.

MINNESOTA STATE BOARD OF
CHIROPRACTIC EXAMINERS

Dated: May 25, 1976.

/s/ E. I. Puckropp, D.C.
EDWARD I. PUCKROPP, D.C.
Secretary-Treasurer

MINNESOTA STATE BOARD
OF CHIROPRACTIC EXAMINERS

PROPOSED NEW RULE RE:
LICENSE RENEWAL FEES

The following new Rule is proposed:

CHAPTER TWO: FEES

Chi 3 (Reserved for future use.)
Chi 4 (Reserved for future use.)
Chi 5 Individual Annual License Renewal

(a) Thirty (30) or more days before January 1 each year, the State Board of Chiropractic Examiners (hereinafter "Board") shall mail to the last address on file with the Board a license renewal fee notice to each person (hereinafter "licensee") licensed to practice chiropractic within this state.

(b) The license of each licensee shall expire at midnight on December 31 each year. The Board shall renew the license upon receipt from the licensee of a license renewal fee of $50.00, plus any applicable penalty fee as set forth in (c) below. Each licensee shall submit the license renewal fee to the Board no later than January 1 of the year for which the license renewal is requested.

(c) A licensee shall submit to the Board, in addition to the license renewal fee, a penalty fee of $5.00 per month for each month or portion thereof for which the license renewal fee is in arrears, such penalty not to exceed $50.00.

This rule shall apply to license renewal effective January 1, 1977, or anytime thereafter.

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

ORDER FOR HEARING

To effectively implement Minn. Stat. § 148.07 subd. 1 (1974), as amended by Minn. Laws 1976, ch. 222, § 48, the Minnesota State Board of Chiropractic Examiners deems it necessary to consider adoption of the proposed rule captioned above pursuant to the authority vested in it by the above-referenced statute, and Minn. Laws 1976, ch. 222, § 3.

IT IS HEREBY ORDERED that a public hearing on the above-captioned proposed rule be held in the Board Room, Minnesota Health Department Building, 717 Delaware Street S.E., Minneapolis, Minnesota on June 30, 1976, commencing at 1:30 p.m. and continuing until all interested persons have had an opportunity to be heard.

IT IS FURTHER ORDERED that a Notice of Hearing be mailed to all persons or representatives of associations or other interested groups who have registered their names with the Secretary of State for that purpose.

Dated: May 25, 1976

MINNESOTA STATE BOARD
OF CHIROPRACTIC EXAMINERS

E. I. Puckropp D.C.

EDWARD I. PUCKROPP, D.C.
Secretary-Treasurer

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE

BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed
Adoption of a Rule of the
State Board of Chiropractic
Examiners Related to License
Renewal Fees

CERTIFICATE OF BOARD'S
AUTHORIZING RESOLUTION

I, EDWARD PUCKROPP, do hereby certify that I am Secretary-Treasurer of the Minnesota State Board of Chiropractic Examiners, a Board duly authorized under the laws of the State of Minnesota, and that the following is a true, complete and correct copy of the motion passed at a meeting of the Minnesota State Board of Chiropractic Examiners duly and properly called and held on the 7th day of March, 1976; that all the Board members were present at said meeting, that said motion was unanimously passed by the Board, is set forth in the minutes of the meeting, and has not been rescinded or modified.

> RESOLVED, that Edward Puckropp, D.C., Executive Secretary of the Minnesota State Board of Chiropractic Examiners, be and he hereby is granted the authority and directed to call a hearing for the purpose of promulgating rules of the Board relating to fees for annual renewal of licenses as well as perform any and all acts incidental thereto, including but without being limited thereto, signing an order for hearing and notice of hearing.

In Witness Whereof, I have hereunto subscribed my name this 25 day of May, 1976.

MINNESOTA STATE BOARD OF
CHIROPRACTIC EXAMINERS

E. L. Puckropp D.C.

EDWARD I. PUCKROPP, D.C.
Secretary-Treasurer

RECEIVED
JUN 7 1976
OFFICE OF HEARING EXAMINERS

MINNESOTA STATE BOARD
OF CHIROPRACTIC EXAMINERS

PROPOSED NEW RULE RE:
LICENSE RENEWAL FEES

The following new Rule is proposed:

CHAPTER TWO: FEES

Chi 3 (Reserved for future use.)

Chi 4 (Reserved for future use.)

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(c) A licensee shall submit to the Board, in addition to the license renewal fee, a penalty fee of $5.00 per month for each month or portion thereof for which the license renewal fee is in arrears, such penalty not to exceed $50.00.

This rule shall apply to license renewal effective January 1, 1977, or anytime thereafter.

RECEIVED
JUN 7 1976
OFFICE OF HEARING EXAMINERS

MINNESOTA STATE BOARD
OF CHIROPRACTIC EXAMINERS

PROPOSED NEW RULE RE:
LICENSE RENEWAL FEES

The following new Rule is proposed:

CHAPTER TWO: FEES

Chi 3 (Reserved for future use.)

Chi 4 (Reserved for future use.)

Chi 5 Individual Annual License Renewal

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(c) A licensee shall submit to the Board, in addition to the license renewal fee, a penalty fee of $5.00 per month for each month or portion thereof for which the license renewal fee is in arrears, such penalty not to exceed $50.00.

This rule shall apply to license renewal effective January 1, 1977, or anytime thereafter.

#1

RULES HEARING AGENDA AND GUIDELIN

This hearing is being conducted by an objective Hearing Examiner appointed and employed by the State Office of Hearing Examiners. He is not an employee of the agency proposing to promulgate these rules and has not discussed the merits of any questions involved with either the agency or with any other interested parties. He will strive to conduct an impartial, even-handed hearing in a fair and expeditious fashion. After the hearing he will weigh the evidence and arguments without any predisposition to either accept or reject the proposed rules in preparing Findings of Fact, Conclusions and Recommendations to the agency. The agency will then make its decision as to whether to adopt, modify or reject the proposed rules after waiting at least ten days, during which time the Findings of Fact and Recommendations will be available to affected persons. If you desire to be notified when these Findings are available, please so indicate on the register and be sure to include your phone number.

I. AGENDA

1. Hearing Convened by Hearing Examiner
2. Introduction of Agency Panel
3. Explanation of Procedure by Hearing Examiner
4. Introduction of Jurisdictional Documents
5. Presentation by Agency
6. Questions and Statements from Attorneys
7. Questions and Statements from Other Interested Persons
8. Hearing Closed by Hearing Examiner

If any person is peculiarly inconvenienced by the above agenda, such as having to get back to his employment or whatever, he should indicate this to the Hearing Examiner who will consider suspending the agenda to accommodate such special circumstances.

II. GUIDELINES

1. Everyone attending the hearing is required to sign the register as you enter indicating your name, address, and the interest or group you represent. If you wish to be notified when the Hearing Examiner's Findings and Recommendations are submitted to the agency, please so indicate.

2. The purpose of this hearing is to consider whether the proposed rules should be adopted and given the force of law, as if adopted by the Legislature itself. The agency must: (a) document its specific statutory authority to take the proposed action, (b) show that it has fulfilled all relevant substantive and procedural requirements of law or rule, and (c) demonstrate the need for and reasonableness of its proposed action with an affirmative presentation of facts. All persons wishing to express their views will have an opportunity to do so.

3. When the Hearing Officer affords you an opportunity to testify, please step to the area designated for statements, spell your name for the benefit of the court reporter, identify your interest or firm, and speak clearly.

4. All witnesses testifying subject themselves to questioning by a representative of the agency, the Hearing Officer and others present. Non-agency interested persons may refuse to consent to questioning by other non-agency persons.

5. If a written statement or other matter reduced to writing is desired to be introduced in evidence, it should be presented to the court reporter to be marked as an exhibit and offered at the appropriate time. Written statements may be introduced at the time an individual offers an oral statement. The right of the agency or others to examine the individual presenting this written statement extends to the content of the statement offered in the written form.

6. This hearing will be recorded by a court reporter. Subsequently a transcript of the proceedings will be available. If you wish to have a copy of the transcript, for which there is a charge, kindly notify the reporter.

7. In order to aid the construction of a proper record, it is requested that witnesses observe the following rules:

a. Only one person shall be allowed to address the hearing at one time.

b. All answers must be verbalized. The court reporter cannot record gestures or the nodding of a head.

c. All technical terms and proper names should be spelled out for the benefit of the court reporter.

8. Attorneys unfamiliar with administrative practice should be aware that the emphasis will be on informality. Exclusionary rules of evidence will be interpreted liberally in the case of all presentations. Exceptions to any rulings are unnecessary and superfluous. The Hearing Examiner will determine what weight should be assigned to evidence and the Findings and Recommendations will be based only on substantial evidence.

9. It should be noted that anyone who desires to submit a written brief or other written comments bearing upon the proposed rules may do so within 20 days of the close of this hearing. Such materials should be submitted to:

Office of Hearing Examiners
Room 300
1745 University Avenue
St. Paul, Minnesota 55104

The materials must be <u>received</u> within the 20-day period to be considered.

10. You are advised that under Minnesota Statutes, Section 10A.01, Subdivision 11 (1974) any individual representing persons or associations attempting to influence administrative action, such as the promulgation of these rules, must register with the State Ethics Commission as a lobbyist within five days of the commencement of such activity by the individual.

#2

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

ORDER FOR HEARING

To effectively implement Minn. Stat. § 148.07 subd. 1 (1974), as amended by Minn. Laws 1976, ch. 222, § 48, the Minnesota State Board of Chiropractic Examiners deems it necessary to consider adoption of the proposed rule captioned above pursuant to the authority vested in it by the above-referenced statute, and Minn. Laws 1976, ch. 222, § 3.

IT IS HEREBY ORDERED that a public hearing on the above-captioned proposed rule be held in the Board Room, Minnesota Health Department Building, 717 Delaware Street S.E., Minneapolis, Minnesota on June 30, 1976, commencing at 1:30 p.m. and continuing until all interested persons have had an opportunity to be heard.

IT IS FURTHER ORDERED that a Notice of Hearing be mailed to all persons or representatives of associations or other interested groups who have registered their names with the Secretary of State for that purpose.

Dated: May 25, 1976

MINNESOTA STATE BOARD
OF CHIROPRACTIC EXAMINERS

E. I. Puckropp D.C.

EDWARD I. PUCKROPP, D.C.
Secretary-Treasurer

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

CERTIFICATE OF BOARD'S AUTHORIZING RESOLUTION

I, EDWARD PUCKROPP, do hereby certify that I am Secretary-Treasurer of the Minnesota State Board of Chiropractic Examiners, a Board duly authorized under the laws of the State of Minnesota, and that the following is a true, complete and correct copy of the motion passed at a meeting of the Minnesota State Board of Chiropractic Examiners duly and properly called and held on the 7th day of March, 1976; that all the Board members were present at said meeting, that said motion was unanimously passed by the Board, is set forth in the minutes of the meeting, and has not been rescinded or modified.

> RESOLVED, that Edward Puckropp, D.C., Executive Secretary of the Minnesota State Board of Chiropractic Examiners, be and he hereby is granted the authority and directed to call a hearing for the purpose of promulgating rules of the Board relating to fees for annual renewal of licenses as well as perform any and all acts incidental thereto, including but without being limited thereto, signing an order for hearing and notice of hearing.

In Witness Whereof, I have hereunto subscribed my name this 25 day of May, 1976.

MINNESOTA STATE BOARD OF CHIROPRACTIC EXAMINERS

E. J. Puckropp D.C.

EDWARD I. PUCKROPP, D.C.
Secretary-Treasurer

#3

STATE OF MINNESOTA
COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

NOTICE OF HEARING

NOTICE IS HEREBY GIVEN that a public hearing in the above-entitled matter will be held in the Board Room, Minnesota Health Department Building, 717 Delaware Street S.E., Minneapolis, Minnesota on June 30, 1976, commencing at 1:30 P.M. and continuing until all interested persons have had an opportunity to be heard.

All interested or affected persons will have an opportunity to participate. Statement may be made orally and written materials may be submitted at hearing. In addition, written materials may be submitted by mail to Mr. Peter C. Erickson, Hearing Examiner, at Room 300, 1745 University Avenue, St. Paul, Minnesota 55104, (612)296-8118, either before the hearing or within 20 days after the close of the hearing.

A copy of the proposed rule is attached and made a part hereof. Additional copies are now available and may be obtained by writing Edward I. Puckropp, D.C., Secretary-Treasurer, Minnesota State Board of Chiropractic Examiners, 717 Delaware Street S.E., Minneapolis, Minnesota 55440. Copies will also be available at the door on the date of the hearing.

The Minnesota State Board of Chiropractic Examiners' authority to promulgate the proposed rule is contained in Minn. Laws, ch. 222, § 3 and Minn. Stat. § 148.07 subd. 1 (1974) as amended by Minn. Laws 1976, ch. 222, § 48.

A "statement of need" explaining why the State Board of Chiropractic Examiners feels the proposed rule is necessary will be filed with the Hearing Examiner's Office at least 25 days prior to the hearing and will be available there for public inspection.

Testimony or other evidence to be submitted for consideration should be pertinent to the matter at hand and may be presented either orally or in writing at the public hearing or by mailing a statement to the Secretary-Treasurer of the State Board of Chiropractic Examiners, address as above. If the person submitting a statement cannot be present to read his statement at the time of the hearing, the statement will be entered into the record. For those wishing to submit written statements or exhibits, it is requested that at least three copies of such statement, exhibit or summary be furnished at the hearing. The record will remain open for receipt of briefs or other written material relative to the proposed rule for 20 days subsequent to the public hearing.

It is suggested that to save time and avoid duplication, those organizations or associations having a common viewpoint or interest in these proceedings join together where possible and present a single statement in behalf of such interests.

Also, please be advised that pursuant to Minn. Stat. § 10A.01, subd. 11 (1974) any individual engaged for pay or other consideration for the purpose of representing persons or associations attempting to influence administrative action, such as the promulgation of this rule, must register with the State Ethics Commission as a lobbyist within 5 days of the commencement of such activity by the individual.

MINNESOTA STATE BOARD OF
CHIROPRACTIC EXAMINERS

Dated: May 25, 1976.

E. I. Puckropp D.C.
EDWARD I. PUCKROPP, D.C.
Secretary-Treasurer

MINNESOTA STATE BOARD

OF CHIROPRACTIC EXAMINERS

PROPOSED NEW RULE RE:

LICENSE RENEWAL FEES

The following new Rule is proposed:

CHAPTER TWO: FEES

Chi 3 (Reserved for future use.)

Chi 4 (Reserved for future use.)

Chi 5 Individual Annual License Renewal

(a) Thirty (30) or more days before January 1 each year, the State Board of Chiropractic Examiners (hereinafter "Board") shall mail to the last address on file with the Board a license renewal fee notice to each person (hereinafter "licensee") licensed to practice chiropractic within this state.

(b) The license of each licensee shall expire at midnight on December 31 each year. The Board shall renew the license upon receipt from the licensee of a license renewal fee of $50.00, plus any applicable penalty fee as set forth in (c) below. Each licensee shall submit the license renewal fee to the Board no later than January 1 of the year for which the license renewal is requested.

(c) A licensee shall submit to the Board, in addition to the license renewal fee, a penalty fee of $5.00 per month for each month or portion thereof for which the license renewal fee is in arrears, such penalty not to exceed $50.00.

This rule shall apply to license renewal effective January 1, 1977, or anytime thereafter.

#4

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE

BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

AFFIDAVIT OF RECEIPT OF THE SECRETARY OF STATE'S LIST

Robert T. Holley, being duly sworn on oath, deposes and says:

1) That he is an employee of the Office of the Attorney General for the State of Minnesota and legal counsel for the Minnesota State Board of Chiropractic Examiners.

2) That on or about the 13th day of May, 1976, he telephoned the Secretary of State's Office for the State of Minnesota and requested a current list of all representatives of associations or other interested groups or persons who had registered their names with the Secretary of State for the purpose of obtaining notices of public hearings relating to the promulgation of rules pursuant to M.S. 15.0412.

3) That on the 17th day of May, 1976, in response to the above request, the Secretary of State provided him with such a list, a copy of which is attached hereto and incorporated by reference.

Further affiant sayeth not.

Robert T. Holley

Subscribed and sworn to before me
this 3rd day of June, 1976.
Marie B. Tromiczak

MARIE B. TROMICZAK
NOTARY PUBLIC - MINNESOTA
HENNEPIN COUNTY
My Commission Expires Oct. 9, 1980

STATE OF MINNESOTA

COUNTY OF RAMSEY

In the Matter of the Proposed
Rules Relating to Board of
Chiropractic Examiners:
License Renewal Fees

CERTIFICATE

I hereby certify that the 482 general labels and one page list for the Minnesota State Board of Chiropractic Examiners all of which are attached and made a part hereof, constitute the complete lists of persons, associations, and other interested groups who as of 10:30 o'clock A .M., this 17th day of May, 1976, have requested pursuant to Minn. Stat. § 15.0412 subd. 4 (Supp. 1975) that their names be placed on file with the Secretary of State for the purpose of receiving notice of public hearing on proposed rules on the subject captioned above.

Joan Anderson Growe
SECRETARY OF STATE

JOAN ANDERSON GROWE

By Neil Dean

#5

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE

BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

AFFIDAVIT OF MAILING

Sharon Schuster, being first duly sworn, deposes and says:

That on the 26th day of May, 1976, at the City of Minneapolis, County of Hennepin, State of Minnesota, she served the attached Notice of Hearing by depositing in the United States mail at said City of Minneapolis, a true and correct copy thereof, properly enveloped, with postage prepaid, to all persons and associations at the addresses listed on the attached Certificate of the Secretary of State.

Sharon Schuster

Subscribed and sworn to before me

this 26th day of May, 1976.

Frank J. Bigham

FRANK J. BIGHAM
Notary Public, Ramsey Co. Mn.
MY COMMISSION EXPIRES
May 16, 1980

#6

STATE OF MINNESOTA
COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE
BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed
Adoption of a Rule of the
State Board of Chiropractic
Examiners Related to License
Renewal Fees

STATEMENT OF NEED

The above-captioned rule is not an amendment to existing rules of the State Board of Chiropractic Examiners (hereinafter "Board").

The need to adopt this rule arises by reason of the Board's inability to fully meet, from total fees presently collected, its anticipated operating expenses for fiscal year 1977. Pursuant to Minn. Laws 1976, ch. 222, § 3, such fees shall be adjusted in "a sufficient amount so that the total fees collected . . . will as closely as possible equal anticipated expenditures." Thus, unless fees are now increased, the Board will be without sufficient operating funds and unable to comply with the foregoing legislative directive.

Specific authority for the Board's adjustment by rule of license renewal and penalty, among other fees, as well as procedural requirements associated therewith, is also set forth in Minn. Laws 1976, ch. 222, § 3. Such authority is further established under § 48 of said 1976 legislation, wherein all references to specific dollar amounts relating to license renewal and penalties under Minn. Stat. 148.07, subd. 1 (1974) are deleted, such amounts to hereafter be "set by the board."

The proposed rule would not alter existing statutory monthly penalty fee amounts, the existing total maximum penalty fee, the current due date for the Board's receipt of license renewal payments, nor the Board's present responsibility to annually provide for due date notice. The sole change

presented by the proposed rule is an increase in annual license renewal fees, which, given the Board's current financial status, is necessary to fulfill the aforementioned new directives of the Legislature.

MINNESOTA STATE BOARD OF
CHIROPRACTIC EXAMINERS

Dated: May 25, 1976.

E. I. Puckropp D.C.
EDWARD I. PUCKROPP, D.C.
Secretary-Treasurer

#7

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

STATEMENT OF EVIDENCE

The State Board of Chiropractic Examiners (hereinafter "Board") will introduce the following evidence at hearing in the above-entitled matter:

1. Documents, which are attached hereto and made part hereof, evidencing the Board's compliance with procedural requirements for rule making, including:

(a) Order for Hearing;

(b) Notice of Hearing as mailed;

(c) Affidavit of Receipt of the Secretary of State's List, together with the Certificate of the Secretary of State; and

(d) Affidavit of Mailing of the Notice of Hearing;

(e) Certificate of Board's Authorizing Resolution.

2. The following documents, which are attached hereto and made a part hereof, constituting the Board's affirmative presentation of facts establishing the need for and reasonableness of the proposed rule and evidencing the Board's compliance with substantive requirements for rule making:

(a) Statement of Need;

(b) Statement of Facts Establishing Reasonableness of Rule; and

(c) Department of Finance approval.

The following witnesses will represent the Board at the hearing:

Marie Anderson, Accounting Officer,
State Department of Health; and

Edward I. Puckropp, D.C.
Secretary-Treasurer
State Board of Chiropractic Examiners; or

William F. Hynan, D.C.
State Board of Chiropractic Examiners.

Said witnesses will be available to answer questions as they might relate to the Board's affirmative presentation of facts as is set forth through the previously listed and attached documents.

As noted where appropriate in the attachments hereto, the Board's statutory authority to promulgate the proposed rule is found at:

Minn. Stat. § 148.07, subd. 1 (1974),
as amended by Minn. Laws 1976, ch. 222,
§ 48; and

Minn. Laws 1976, ch. 222, § 3.

MINNESOTA STATE BOARD OF
CHIROPRACTIC EXAMINERS

Dated: May 25, 1976.

E. I. Puckropp D.C.
EDWARD I. PUCKROPP, D.C.
Secretary-Treasurer

#8

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE

BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

STATEMENT OF FACTS ESTABLISHING REASONABLENESS OF RULE

The Minnesota State Board of Chiropractic Examiners (hereinafter "Board") hereby affirmatively presents facts establishing the reasonableness and justifying the adoption of the above-captioned rule relating to individual annual license renewal fees, penalties and procedures associated therewith. The Board's statutory authority to promulgate the instant rule is established under Minn. Laws 1976, ch. 222 § 3 and Minn. Stat. § 148.07 subd. 1 (1974) as amended by Minn. Laws 1976, ch. 222 § 48.

The proposed rule is entitled "Chi 5, Individual Annual License Renewal." Part (a) of this three part rule provides as follows:

> (a) Thirty (30) or more days before January 1 each year, the State Board of Chiropractic Examiners (hereinafter "Board") shall mail to the last address on file with the Board a license renewal fee notice to each person (hereinafter "licensee") licensed to practice chiropractic within this state.

This 30 day notice requirement merely puts into rule form prior statutory notice procedures deleted from Minn. Stat. § 148.07 subd. 1 (1974) by Minn. Laws 1976, ch. 222 § 48.* It is the Board's position that, although failure to receive notice from the Board does not relieve licensees from the requirement to timely pay license renewal fees, such notice procedures and the cost

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* The repeal of the statutory notice does not mean that the Legislature intended that the notice procedure be discontinued. The Legislature has over the last several years attempted to delete statutory licensing fee provisions and procedures and has authorized the respective administrative agencies to establish them by rule. See, e.g., Minn. Stat. § 144.122 (Supp. 1975). Authorizing the administrative agencies to promulgate rules in these areas permits the more feasible adjustment of such fees and procedures. Further, Minn. Stat. § 15.0412 subd. 3 (Supp. 1975) requires the Board to promulgate its procedures in rule form.

and obligations they impose upon the Board remain a reasonable and proper means of giving licensees fair notice of the amount and due date for license renewal. Additionally, years of Board usage respecting the 30 day notice mailing and its timing have caused the procedure to become a custom, now relied upon by licensees as a payment reminder and employed by the Board as an established and efficient means of collecting renewal fees.

Part (b) of the rule contains the single substantive proposed change in existing statutory license renewal requirements. It would raise the current annual renewal fee from $25.00 to $50.00. Part (b) reads as follows:

> (b) The license of each licensee shall expire at midnight on December 31 each year. The Board shall renew the license upon receipt from the licensee of a license renewal fee of $50.00, plus any applicable penalty fee as set forth in (c) below. Each licensee shall submit the license renewal fee to the Board no later than January 1 of the year for which the license renewal is requested.

The justification for an increase in the current license renewal rate as well as the amount of increase is founded in Minn. Laws 1976, ch. 222 § 3, which states that Board fees are to be adjusted in "a sufficient amount . . . so that the total fees collected by each board will as closely as possible equal anticipated expenditures."

Further, a 1975 appropriations bill provision makes it absolutely critical that the income generated by fees at the very best equal expenditures. While the health licensing boards are required to charge fees related to their licensing activities, the income so generated is paid into the general fund. The Legislature then makes a specific appropriation to the boards. However, Minn. Laws 1975, ch. 434 § 4 (uncoded) expressly prohibits the expenditure of any funds so appropriated which are in excess of the Board's revenue.

As is demonstrated in the Fee Analysis Statement, which is attached hereto as Exhibit A and made a part hereof, the Board operated at a $5,000 deficit in fiscal year 1976. Without the proposed increase in renewal fees, said deficit would nearly triple in fiscal 1977. Thus, the amount of increase, dictated by legislative directive, is necessitated by the Board's present financial condition and expenditure and revenue estimates for fiscal 1977. Moreover, because renewal fees must be paid by every licensed chiropractor and generate the largest source of Board revenue, limiting a fee increase at this time to license renewals only results in the most equitable distribution of

the increase. (Since the other fees which the Board collects are not being changed or promulgated at this time, they remain at their statutory levels pursuant to Minn. Laws 1976, ch. 222 § 210.)

The license expiration and renewal dates set forth under part (b) of the proposed rule again represent a transfer to rule form of prior statutory provisions deleted from the Chiropractic Practice Act by Minn. Laws 1976, ch. 222 § 48. The proposed annual license renewal dates are reasonable and consistent with efficient Board administrative usage and licensee expectations arising from usage in the past. It is also apparent that without fixed license expiration and renewal periods, this fee rule could not be administered.

The final part of the proposed rule, part (c) states:

> (c) A licensee shall submit to the Board, in addition to the license renewal fee, a penalty fee of $5.00 per month for each month or portion thereof for which the license renewal fee is in arrears, such penalty not to exceed $50.00.

The above provisions are adopted, nearly verbatim, from the text of Minn. Stat. 148.07 subd. 1 (1974) prior to its amendment pursuant to Minn. Laws 1976, ch. 222 § 48. The 1976 amendments maintain the Board's authority to assess renewal penalty fees while merely deleting the amount of such fees and providing that such amounts hereafter be "set by the board."

Assuming the adoption as here proposed of an increase in renewal fees, no change need be made at this time in the amount of the monthly or total penalties which have historically been imposed by the Board. The need for penalty fees is clear. Such fees discourage licensees from filing their renewal applications late and thereby help prevent violations related to practicing without a license. Late submissions also add an administrative burden to the Board by increasing administrative costs caused by the additional staff time required to process such submissions out of cycle.

On the basis of the foregoing, including the attached Exhibit A, the Board finds the proposed rule and each of its parts to be reasonable and justified.

MINNESOTA STATE BOARD OF
CHIROPRACTIC EXAMINERS

Dated: June 3, 1976.

E. I. Puckropp D.C.
EDWARD I. PUCKROPP, D.C.
Secretary-Treasurer

EXHIBIT A

BOARD OF CHIROPRACTIC EXAMINERS

Fee Analysis Statement
FY 77 Estimates

EXPENDITURES

Part Time Employees	$ 5,000
Board Per Diem	4,500
Rents and Leases	615
Repairs	50
Printing and Binding	500
Purchased Services (Legal)	11,500
Data Processing	350
Communications	1,500
Travel, In-State	2,000
Travel, Out-of-State	1,200
Other Contractual Services	235
Supplies and Materials	350
Equipment	500
FY 76 Deficit	5,000
	$ 33,300

REVENUE

Chiropractor Renewals	615 @	$ 50	$30,750
Examination Fees	40 @	50	2,000
Initial Corporation Fee	5 @	100	500
Corporation Renewal Fee	30 @	25	750
Penalty Fees			100
			$ 34,100

#9

STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

DEPARTMENT OF FINANCE APPROVAL

Minn. Stat. § 148.07 subd. 1 (1974), as amended by Minn. Laws 1976, ch. 222, § 48, authorizes the State Board of Chiropractic Examiners (hereinafter "Board) to establish an annual license renewal fee and penalty fee for chiropractors. Minn. Laws, ch. 222, § 3 provides that ". . . health related licensing boards . . . may by rule, with the approval of the commissioner of finance, adjust any fee which the board is empowered to assess a sufficient amount . . . so that the total fees collected by each board will as closely as possible equal anticipated expenditures."

The above-captioned rule of the Board would increase the annual license renewal fee from twenty-five ($25.00) to fifty dollars ($50.00) plus establish a penalty fee of five dollars ($5.00) per month, such penalty not to exceed fifty dollars ($50.00).

Upon review of the attached supporting information justifying the need, reasonableness and amounts of the new renewal fee and penalty fees, and pursuant to the authority vested in the Minnesota Department of Finance by Minn. Laws 1976, ch. 222, § 3, the fees set forth in the proposed rule of the Board are hereby approved.

GERALD W. CHRISTENSON
COMMISSIONER

Dated: May 25, 1976

By Bernard Carlson
BERNARD J. CARLSON
Budget, Planning and
Control Director

BOARD OF CHIROPRACTIC EXAMINERS

Fee Analysis Statement
FY 77 Estimates

EXPENDITURES

Part Time Employees	$ 5,000
Board Per Diem	4,500
Rents and Leases	615
Repairs	50
Printing and Binding	500
Purchased Services (Legal)	11,500
Data Processing	350
Communications	1,500
Travel, In-State	2,000
Travel, Out-of-State	1,200
Other Contractual Services	235
Supplies and Materials	350
Equipment	500
FY 76 Deficit	5,000
	$ 33,300

REVENUE

Chiropractor Renewals	615 @	$ 50	$30,750
Examination Fees	40 @	50	2,000
Initial Corporation Fee	5 @	100	500
Corporation Renewal Fee	30 @	25	750
Penalty Fees			100
			$ 34,100

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STATE OF MINNESOTA

COUNTY OF HENNEPIN

BEFORE THE MINNESOTA STATE

BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees

STATEMENT OF NUMBER OF PERSONS EXPECTED TO ATTEND AND LENGTH OF HEARING

The number of persons expected to attend the hearing in the above-captioned matter is 20, and it is estimated that the length of the hearing will be one hour.

MINNESOTA STATE BOARD OF CHIROPRACTIC EXAMINERS

Dated: May 25, 1976.

E. I. Ruckropp D.C.

EDWARD I. RUCKROPP, D.C.
Secretary-Treasurer

Auditor in Charge:
Earl M. Fisher, C.P.A.

#11

AUDIT REPORT

STATE BOARD OF CHIROPRACTIC EXAMINERS

Years Ended June 30, 1972, 1973, and 1974

- - -

Operating under Minn. Stat. (1971) Sections 146.12 to 146.22 as amended by Laws 1974, Chapter 224, Sections 3 to 6; 148.01 to 148.10 as amended by Laws 1973, Chapter 638, Sections 10 to 13 and Laws 1974, Chapter 564; 319.71 to 319.92 as amended by Laws 1973, Chapter 40 and Laws 1974, Chapter 504; and Laws 1973, Chapter 638, Sections 61 to 68 as amended by Laws 1974, Chapter 406, Sections 81 to 86.

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ROBERT A. WHITAKER,
Legislative Auditor,
Saint Paul, Minnesota.

State Board of Chiropractic Examiners

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Legislative Auditor, State of Minnesota

AUDITOR'S REPORT

This report on an audit of the state board of chiropractic examiners covers the years ended June 30, 1972, 1973, and 1974.

The examination was made in accordance with generally accepted auditing standards, and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the statement of cash receipts and disbursements in this report presents fairly the cash transactions of the state board of chiropractic examiners for the years ended June 30, 1972, 1973, and 1974.

Legislative Auditor - State of Minnesota

COMMENTS

Introduction

The state board of chiropractic examiners consists of five qualified resident chiropractors and two public members appointed by the governor for five-year terms. Laws 1973, Chapter 638, Section 10, provided for the appointment of the two public members, whose initial appointments are for three and five years, and thereafter for five years.

The current members of the board are Kenneth J. Flolid, Richard J. Kieffer, Charles F. Krassas, August J. Schaub, and Robert L. White, resident chiropractors, and Grace Mitchell and Mary Jane Ploof, public members. Herman Ahrenholz and Victor Marty were also members of the board during this audit period. Robert L. White is the secretary-treasurer at the present time.

Duties of the board include the examination of persons desirous of practicing chiropractic, the issuance of licenses to persons deemed qualified to practice chiropractic, and the annual registration of persons engaged in the profession.

The activities of the board are financed by fees for examinations, registrations, and annual renewals.

Financial Summary

A summary of receipts, cash short, disbursements, and transfers for the years ended June 30, 1972, 1973, and 1974 follows:

	Year Ended June 30		
	1972	1973	1974
Undisbursed balance July 1 per department of finance - Note 1	$ 4,958	$11,918	$ 4,744
Receipts per Board Records:			
Chiropractic license renewals	$14,340	$14,805	$14,650
Basic science renewals	5,560	5,740	5,710

Financial Summary (Continued)

	Year Ended June 30		
	1972	1973	1974
Receipts per Board Records: (Continued)			
Fees -			
Examination	1,150	1,700	1,600
Corporation application	200	300	600
Corporation renewal	125	150	25
Duplicate license	10	5	
Basic science registration	60	114	36
Unidentified receipts			790
Correction of error	(186)	186	
Total Receipts per Board Records	$21,259	$23,000	$23,411
Cash short		9,570	425
Total receipts per department of finance	$21,259	$13,430	$22,986
Undisbursed balance and receipts per department of finance	$26,217	$25,348	$27,730
Disbursements:			
Personal services -			
Board members per diem	$ 3,937	$ 4,856	$ 6,218
Expense and contractual services -			
Rents and leases	1,688	1,972	1,864
Printing and binding	50	65	99
Attorney fees	3,186	7,635	12,307
Clerical and secretarial fees	1,990	2,726	2,375
Communications	696	895	937
Travel and subsistence	957	1,455	1,889
Other services	184	132	249
Supplies and materials -			
Stationery and office supplies	511	205	249
Total Disbursements	$13,199	$19,941	$26,187
Net transfers to general fund	1,100	663	1,149
Total disbursements and transfers	$14,299	$20,604	$27,336
Undisbursed balance June 30 per department of finance	$11,918	$ 4,744	$ 394

Note 1: State auditor prior to establishment of department of finance.

Cash Short

The audit disclosed that cash received by the board for license renewals totaling $9,995 was neither deposited with the state treasurer nor on hand in the board office.

Unsigned copies of 11 deposit slips, form MSA8, on file in the board offices indicated that cash receipts totaling $9,570 and $425 during the years ended June 30, 1973 and 1974, respectively, had been prepared for deposit in the state treasury. However, these receipts were never received at the office of the state treasurer.

The missing receipts consisted of currency totaling $62 and checks or money orders totaling $9,933.

Correspondence with the payors revealed the missing checks were not charged against the payors' bank accounts.

Mrs. Joan Hobbie, a part-time employee, does secretarial and clerical work for the board. She collects fees, issues license renewal receipts, and prepares deposits for remittance to the state treasurer. Mrs. Hobbie explained that her normal procedure is to mail the deposit and the required copies of the deposit slip to the state treasurer. One copy of the deposit slip is retained pending the return of a signed copy from the state treasurer's office.

Mrs. Hobbie stated that she had followed the normal procedure and mailed the receipts represented by the 11 unsigned copies of deposit slips to the state treasurer, but the signed copies were never returned to her. She further stated that although she had made telephone inquiries to find out why she had not received signed copies of deposit slips from the state treasurer's office, she was never given any answer, and that she did not know the identity of the person or persons to whom she had spoken. Mrs. Hobbie said that she had told Dr. White more than once that she had not received the signed copies of the deposits. Dr. White told auditors that she may have mentioned this fact to him.

Renewal Receipts Not Received by Licensees

The board uses prenumbered renewal receipts to annually update licenses. The renewal receipt is to be mailed to the chiropractor and the name, fee, and date issued is recorded on the receipt stub.

Many renewal receipts, for which stubs were found in the receipt books, were never received by the chiropractors. Many memos of calls complaining of nonreceipt of renewal receipts were found in the board office. As a result of these complaints, 85 duplicate renewal receipts were issued for 1973 registrations as compared to less than five for 1972.

Correspondence with chiropractors whose payments were part of the missing deposits revealed that most had not received the original renewal receipts that board records indicated had been sent to them.

Mrs. Hobbie told auditors that she had discussed the problem with a clerk at the local post office but had not filed an official complaint.

Although Dr. White was aware of the fact that many licensees were not receiving their renewal receipts, his only action was to instruct Mrs. Hobbie to send duplicate receipts.

We contacted postal authorities who stated they had no record of any postal irregularities during this time period for the Golden Valley area.

Records Not Properly Maintained

The journal of receipts and disbursements and the individual licensees' cumulative records of renewal payments had not been posted for over two years. Mrs. Hobbie stated that she kept track of licensees' payments each year on a list of the previous year's licensees. Auditors found that renewal payments had not always been posted to the list.

Although in prior years Mrs. Hobbie had periodically reconciled the undisbursed balance per the board records to the balance per the state auditor

Records Not Properly Maintained (Continued)

(now the department of finance), she stated that she had not done so for the last two years.

* If reconciliations had been made in a timely manner, the cash shortage would have been discovered at an earlier date and procedures could have been established to safeguard the funds.

Near the end of fiscal year 1974, funds totaling $790 were deposited with the state treasurer that could not be identified with license renewals, examination applications, or other receipts. Mrs. Hobbie told auditors that she was unable to identify the source of the receipts.

Instances were noted where receipts in excess of $50 were not deposited daily. Minn. Stat. Section 16.18 provides that all receipts shall be deposited with the state treasurer each day, unless such receipts are under $50, in which event the deposit may be deferred until they aggregate such sum.

The minutes of the September 1973 board meeting were not included in the board minute book.

Recommendations

We make the following recommendations:

A control record of receipts, disbursements, and balances be maintained on a current basis and the balance reconciled with statements of the department of finance.

In addition to the prenumbered renewal receipts now being issued, prenumbered receipts be issued for all other amounts received.

Records indicating annual renewal payments by individual licensees be maintained on a current basis.

Receipts be promptly deposited with the state treasurer in accordance with Minn. Stat. Section 16.18.

Minutes of all board meetings be maintained in the official board minute book.

Recommendations (Continued)

* The secretary-treasurer should properly supervise any clerical help retained to assist with board records. He should accept the responsibility of seeing that all records are maintained on a timely basis and of promptly investigating any suspected problems.

Current Status of Missing Deposits

The secretary-treasurer has requested licensees whose checks were included in the missing deposits to submit payment to replace those checks that are missing and were not redeemed.

License renewals should not be issued to these licensees until payment is made for the missing unredeemed checks.

Robert A. Whitaker
Legislative Auditor

Date field work completed: September 23, 1974

Date audit report signed: January 27, 1975

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Legislative Auditor - State of Minnesota

#12

Some state chiropractors

By Bob Goligoski

Staff Writer

Some Minnesota chiropractors are increasing their incomes substantially and quickly by charging excessive fees, giving unneeded treatments and unethically asking for payment in advance after promising relief, according to their chiropractic critics.

It has been learned that annual incomes for chiropractors are going as high as $400,000 in Minnesota.

ONE METHOD being used by some chiropractors to increase income is signing up with Clinic Masters, Inc. (CM), a Colorado Springs, Colo., consulting organization.

For a $12,500 price, CM tells chiropractors in promotional brochures that it can "show you how to double your income . . . we have hundreds of clients who, by working along with us, are earning large incomes . . . many in excess of $150,000 a year . . . some much more . . . these doctors are working smarter, not harder."

In recent issues of "Clinic Masters Review," a CM publication, 26 Minnesota chiropractors are identified as CM clients.

THE ACTUAL number may be about 45 or approximately 10 per cent of Minnesota's estimated 450 chiropractors. CM claims to have 2,000 clients nationally.



St. Paul Di

'adjust' incomes upward

All of the 26 CM clients, many of whom are from St. Paul and other parts of the metropolitan area, are cited in the review as making at least $50,000 a year.

The review reports that one of its clients in a St. Paul suburb has dramatically jumped his annual income to $400,000.

Another local suburban chiropractor is praised for increasing his yearly income from $50,000 to $200,000 in four months.

CM STATES that one of its clients in south central Minnesota has a $200,000 annual salary while a northern Minnesota chiropractor took only five months to increase his annual income from $50,000 to $150,000.

Some of the most prominent chiropractors in the state are identified as CM clients including a former president of the Minnesota Chiropractic Association (MCA), a past chairman of the MCA ethics committee and a member of an important peer review board.

How are the incomes being increased?

Chiropractors who sign contracts with the firm agree not to divulge the formula for success, but here is how the system is supposed to work:

See Chiropractors, Page 3

Spotty

NW ★

Wednesday
Dec. 11, 1974
Single Copy Price—15c

The Dispatch
Wed., Dec. 11, '75

Chiropractors: Incomes 'adjusted'

Continued from Page 1

PART OF the plan is to introduce a lot of muscle manipulating machines into a chiropractic practice and to use "multiple charges" or, euphemistically, "unit pricing."

For example if a chiropractor is charging a flat $8 for an office call now, he is advised to also charge separately for each individual treatment he gives during the call.

He would then charge another $8 for diathermy (deep heat), $8 for traction and $8 for ultrasound (applying a high-frequency sound device to the skin), for example, so the patient's bill for the visit would be $32 instead of $8.

Chiropractors also are told to consider adding "intensive care" units to their clinics.

IN THE UNITS, according to the sources, patients are treated periodically through a full day and are billed added fees for the extra attention. One CM survey found that the average cost per day for patients receiving intensive chiropractic care is $129.43.

A copyrighted CM client sheet also stresses the importance of evaluating insurance policies "which you are filing a claim against. Some policies will only pay for one visit a day but will pay for multiple therapy when listed on that one visit.

"Others will not pay for multiple therapy, but will pay for two visits a day. Make sure that your treatment schedule and billing system is in accord with the provisions in the policy whenever possible."

THE CM ADVISORY, entitled "multiple therapy and insurance problems," also points out that the "more specific you can be regarding the treatment, the better chance you will have that the claim will be paid.

"Whenever possible, you should list ultrasound, intersegmental traction, diathermy, pulsed-diathermy, sine wave and other specific treatments. If you are in doubt exactly about what your treatment does, it is better to use broad categories such as "electro therapy" or "physiotherapy" than to put down the brand name of a device or treatment machine."

CM officials would respond to Dispatch inquiries about their program only by letter. CM co-founder and president Dr. Gordon D. Heuser stressed that "there are two good reasons why every doctor should evaluate his patients' insurance policy.

"THE FIRST reason is so that, prior to any treatment, the patient may be advised what part of the bill they may expect to be paid by insurance and what part he may have to pay himself and, two, when the patient requests his care be limited to services covered by his insurance, the doctor should, when possible, render treatment in accord with the patient's wishes."

In an interview last year with the Digest of Chiropractic Economics, Drs. Heuser and Rolla J Pennel, CM's other founder, were asked to respond to the charge that the program is too money oriented.

Their reply:

"We see money as a reciprocal of service. They are opposite sides of the same coin, in fact virtually inseparable. It is our experience that service never goes unrewarded. In the health field, that reward is usually money.

"SO I GUESS by these standards, if we are considered to be money oriented, we must also be considered to be service oriented. Perhaps, also, CM clients are more appreciative of the true value of chiropractic. Rather than their overcharging, maybe others are undercharging."

Asked about his opinion of the CM program, one well-known St. Paul chiropractor opined that "some chiropractors are more interested in the dollar than the patient."

Though there is plenty of language in CM literature about providing service to the patient, heavy emphasis also is placed on financial rewards.

IN ONE recent story about a CM gathering, the review reported that "many fellow CMs found it difficult to keep the tears from their eyes as his lovely wife proudly hung the green Medallion around his neck." You get a green medallion from CM for making $350,000 a year.

CM maintains that its clients are staying within the law while amassing substantial incomes.

"To the best of our knowledge, in working with over 2,000 clients," writes Dr. Heuser, "we have had only four who have been involved in any state board disciplinary actions. This is a remarkable record, far better than the average for all professions, and two of these disciplinary actions involved test issues on previously undecided matters."

Two St. Paul chiropractors, identified in the review as CM clients, ran afoul of the state Board of Chiropractic Examiners last year. They are the Arvold brothers, Roger and Jordon, who operate the Arvold Chiropractic Clinic at 1299 Arcade St.

JORDON ARVOLD, the board found, demonstrated "unprofessional misconduct" and had his license revoked for 30 days for allegedly promising to correct a slipped disc in a man's lower back, a condition the board's attorney said can't be corrected except possibly through fusion surgery.

The attorney noted that the chiropractor said the treatment would cost $3,800 but offered a 5 per cent discount for payment in advance. He said that the man paid $3,600, received three days of treatment and then backed out of the arrangement and got at least $3,100 back from the clinic.

Both of the Arvolds are making annual incomes of $200,000, according to the CM review.

ROGER ARVOLD'S license was revoked for using acupuncture but the

revocation was suspended on the condition he discontinue the needle treatment.

Last year, the state Board of Medical Examiners adopted a resolution stating that "acupuncture is the practice of medicine and should be done only by qualified physicians."

In their interview in the Digest of Chiropractic Economics, the founders of CM acknowledged that they advocate the use of acupuncture by chiropractors. Estimates from within the chiropractic profession in Minnesota place the number of state chiropractors using needle acupuncture to between 10 and 50.

DR. HEUSER told the Dispatch that "we recommend chiropractors embrace any new technology or treatment that falls within the scope of practice in their state. Since state laws vary, we recommend the doctor always practice within the confines of the state laws and the rules and regulations of the Board of Examiners and, if in doubt, should consult with this body before making a decision.

"Each client must assume this responsibility himself in making that determination."

One young Minneapolis area woman recently complained about a "bad experience" she had with a CM chiropractor.

SHE SAID in an interview that she went to see the chiropractor because of a stiff neck. The condition had bothered her from time to time when she formerly lived in Wisconsin but it was usually alleviated with a $5 visit to a chiropractor there.

The Minneapolis area chiropractor told her that she would have to pay $8 per office call and more if she needed additional treatment. He took X rays and charged her between $75 and $100.

Then he told her that her back was out of place, by her account, and pressure was being exerted on some nerves.

SHE ALSO had a minor pain in the lower calf of one leg. "He told me that if the condition was not promptly corrected, I'd become a cripple. That really scared me."

The chiropractor told her that she would need six months of treatment which he would provide for approximately $1,000. There was to be a discount if she paid cash immediately.

"He kept pushing for money," she recalled, "and finally it was agreed I would pay him when the insurance company paid me. He recommended

See Chiropractors, Page 4

Chiropractors: Son

Continued from Page 3

that I come for treatment everyday?"

That, and other suggestions from the chiropractor, caused her more than a little concern about his "irregular behavior."

SHE ALSO said that she told him one day that she was having some "womanly problems" and he offered her a new "combination vitamin" which he thought would help out. When she asked what was in the pill, he said he wasn't quite sure but noted that it was something new that was being tried out on patients to see how it would work.

She changed to another chiropractor after paying the first one $200 for two months of periodic treatment.

An elderly man said he also had started going to the same Minneapolis chiropractor but quit after four treatments when the chiropractor told him he wanted $1,250 in advance to alleviate his back pains with several months of treatments, including vitamins.

ANOTHER CM client in the St. Paul area reportedly was asked to appear before the Minnesota Chiropractic Peer Review Board after he charged $1,750 in advance to treat a woman for a back problem over a period of less than six months.

The board, according to one report, reduced the bill by $400 because it was an unnecessarily high fee.

Chiropractic officialdom in Minnesota has little to say publicly about Clinic Masters.

Dr. Dennis Arne of Wayzata, president of the Minnesota Chiropractic Association, said that the organization hasn't taken any formal position relative to the 11-year-old CM program. About 300 chiropractors belong to MCA.

STRESSING that he isn't a CM client, Dr. Arne said that "it has been my feeling that some Clinic Masters things for utilization in office procedures have been of help to many doctors but I can't condone all the facets that they have indicated for utilization."

Dr. Robert L. White Jr. of Golden Valley, secretary-treasurer of the examining board, claimed that he "doesn't know much about their program. I only hear about it from rumors. They have come into Minnesota on several occasions and made their pitch."

Dr. Walden Schoenheider of Robbinsdale, chairman of the Minnesota Chiropractic Peer Review Board, said that, "I have no comment about Clinic Masters because there are too many ramifications."

Dr. Schoenheider is identified as a CM client in the CM review.

ASKED FOR his opinion of the CM program, Dr. John B. Wolfe, president of Northwestern College of Chiropractic in St. Paul declined to comment saying that, "I don't want to be quoted. I don't want to be in the controversy."

The CM review reports that two of its Minnesota clients are on the Northwestern faculty. Northwestern says it is the only chiropractic college in the state.

Although several chiropractors said that CM is often a hotly debated subject among the professional ranks, virtually all of them contacted refused to be interviewed about Clinic Masters.

THEIR RETICENCE is

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TELLS HOW CLIENTS HAVE INCREASED INCOME

Consultants' head answers qu

Dr. Gordon D. Heuser, president of Clinic Masters, Inc., the Colorado Springs, Colo., consulting firm, responded in writing to written questions stipulating that answers to questions could be used only if printed in their entirety so as to avoid distortion or misrepresentation of his answers.

In answer to a query regarding how CM clients are able to boost annual incomes to more than a quarter million dollars with advice from the firm, Dr. Heuser replied:

"Many clients have increased their income by the following means:

1. Increased efficiency of operation of billing procedures through modern accounting systems.

2. By providing the establishment of credit arrangements in order to make services available to any or all people regardless of their financial situation.

3. Through the use of ancillary staff of chiropractic receptionists, chiropractic assistants and assistants trained in laboratory and X-ray methods. Use of ancillary personnel has freed a substantial amount of the doctors' time and enabled them to subsequently see many more patients.

4. Use of modern equipment which saves doctors' time and increases patient results.

5. Improvement of and expansion of professional facilities have enabled many doctors to care for more patients during their work day.

6. The raising of fees is a personal matter which each client must decide. In some cases it may be indicated if his fees are below the average in the area, if they are not in harmony with the quality of care he is giving, if it is necessary to meet increased operating expenses, if he has evolved into a specialty practice and has not adjusted his fees up to the level of others practicing this specialty, or from time to time to keep up with inflation the same as everyone else."

QUESTION: Does CM recommend that chiropractors give their patients new types of treatments?

DR. HEUSER: "We recommend chiropractors embrace any new technology or treatment that falls within the scope of practice in their state. Since state laws vary, we recommend the doctor always practice within the confines of the state laws and the rules and regulations of the Board of Examiners and, if in doubt, should consult with this body before making a decision. Each client must assume this responsibility himself in making that determination."

QUESTION: Do you advocate "unit" or "multiple charge" pricing?

DR. HEUSER: "We foresee that the unit pricing method is the trend toward which fees in all professions are moving because of the increased percentage of patients with insurance coverage which requires itemization of services. Unit pricing is rather widely prac-

Some 'adjust' incomes

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explainable on two accounts.

When a chiropractor signs a contract with CM, he agrees not to divulge any portion of the CM system. If he does so, under the contract he is liable for "liquidated damages in the sum of $10,000 for each such person to whom the CM system, or any portion thereof, has been divulged."

An "official notice" also has been sent by CM to some chiropractors in this area stating that CM has "established a $10,000 reward to the person who is first to submit and substantiate the factual information which leads to successful prosecution of any libel or slander suit.

"If anyone hears or reads any disparaging statements about Clinic Masters or its clients, or if you have received information which is derogatory to Clinic Masters, mail the enclosed card to receive an official reward application. You may be eligible for a $10,000 reward."

IN HIS LETTER to the Dispatch, Dr. Heuser writes that "it is our opinion Clinic Masters has been libeled and slandered by irresponsible individuals and groups. We are presently gathering information for legal action to remedy this situation.

"A $10,000 reward has been established for information leading to the effective prosecution of a libel or slander suit. Clinic Masters has enjoyed a very fine reputation in the chiropractic profession, has an advisory board composed of outstanding educational and association leaders and does not intend to tolerate any further libelous and slanderous action."

One member of the peer review board in Minnesota offered some suggestions on choosing a chiropractor with fair prices and services:

ASK WHAT the standard office fee will be. The chiropractor should be glad to give it. Office calls generally range between $7.50 and $11 in Minnesota.

BE WARY of "cures" related to a set number of teatments or time period. Get suspicious when a chiropractor says, "I can help you, but it will take six months of intensive care."

DON'T BE pressured by scare tactics that include threats of "irreversible damage" if the treatment isn't done by him.

DON'T MAKE advance payments and look elsewhere for treatment when you are offered discounts for lump sum payments.

BE CAUTIOUS if a chiropractor orders a large number of X-rays and other tests, especially before taking a medical history. A careful medical history should be taken before treatment.

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ticed in all of the professions. Virtually all state chiropractic associations endorse unit pricing and publish relative value scales which vary substantially from state to state.

"Our clients are rather equally divided in their methods between using the all inclusive "visit" charge and the unit pricing method. We recommend our clients establish a standard fee for each service rendered that is applicable to all patients and in harmony with fees charged when similar services are rendered by other professions.

"We also recommend that no patient ever be turned away because he does not have the ability to pay. As doctors perform more and more service on each visit in order to gain quicker results, better results and longer lasting results, the time, staff, facilities involved demand additional compensation for such services."

#13

Examined by:
T. R. McNamara

REPORT OF PUBLIC EXAMINER

on the

FINANCIAL AFFAIRS

of

STATE BOARD OF CHIROPRACTIC EXAMINERS

Years Ended June 30, 1967, 1968,
1969, and 1970

- - -

Operating Under M.S.A. Sections 146.12 to 146.22
and 148.01 to 148.10

-

Public Examiner

ROBERT A. WHITAKER,
Public Examiner,
Saint Paul, Minnesota.

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Receipts and Disbursements	Exhibit A	5-6

Public Examiner

ACCOUNTANT'S REPORT

This report on an examination of the financial affairs of the State Board of Chiropractic Examiners covers the years ended June 30, 1967, 1968, 1969, and 1970.

The examination was made in accordance with generally accepted auditing standards, and accordingly included such tests of the accounting records and such other auditing procedures as were considered necessary in the circumstances.

It is the opinion of this department that the statement of cash receipts and disbursements contained in this report presents fairly the cash transactions of the State Board of Chiropractic Examiners during the years indicated in such statement.

COMMENTS

The State Board of Chiropractic Examiners consists of five qualified resident chiropractors appointed by the governor for five-year terms.

Duties imposed upon the Board include the examination of persons desirous of practicing chiropractic, the issuance of licenses to persons deemed qualified to practice chiropractic, and the annual registration of persons engaged in the profession.

Laws 1969, Chapter 726 authorized the Board to register chiropractors' professional corporations for the purpose of rendering professional service and to renew annually such registrations. During the period covered by this examination one has been registered.

The activities of the Board are financed mainly by fees for examinations, registrations, and annual renewals.

Receipts and Disbursements

Receipts and disbursements of the Board during the years ended June 30, 1967, 1968, 1969, and 1970 are shown in Exhibit A.

The increase in the amount of receipts for basic science registrations is due to the fee having been increased by the Board in September 1969 from $3.00 to $10.00 under authority of M.S.A. Section 146.13.

A gift of $6,500.00 was made in the year ended June 30, 1970 by the Minnesota Chiropractic Association because the Board's funds were being depleted.

The increase in disbursements is due chiefly to increased legal expense, resulting generally from scope of practice and disciplinary cases.

Disbursements for legal costs increased from $6,123.87 in the year ended June 30, 1967 to $21,814.49 in the year ended June 30, 1970. An additional

Public Examiner

Receipts and Disbursements (Continued)

amount of $1,171.98 for legal services rendered in June 1970 was paid September 2, 1970.

Warrants for payments for legal services were made to the Special Assistant Attorney General for the Board, and include amounts for services rendered by other individuals as assistants and for research and clerical services.

Compensation of Secretary-Treasurer

M.S.A. Section 148.07 provides in part that each member of the Board shall receive a fee of $25.00 per day in attending meetings of the Board and for such other times as he may actually be engaged in business of the Board.

Since January 1, 1966 the secretary-treasurer, who is a member of the Board, has been paid a monthly salary of $400.00 for services, in addition to per diem payments for attendance at meetings. The secretary-treasurer, in turn, paid an average of about $146.00 monthly for clerical assistance, in addition to devoting undetermined amounts of his and his office secretary's office time, on Board matters. This arrangement replaced the services of a full-time clerical employee which were costing $386.70 monthly up to her termination in December, 1965.

There is no authority for payment of a salary to a member of the Board. If the secretary-treasurer is paid on a per diem basis for these services, he should submit itemized statements showing each day worked.

In addition to the salary payments, a total of $2,025.60 was paid from January 1, 1966 to June 30, 1970, from the Board's account, as the employer's share of State retirement matching and social security tax. Since the secretary-treasurer may be paid only the per diem fee, he does not qualify for State retirement and social security coverage, and the employer matching payments should be refunded to the Board's account.

Robert A. Wilkinson

Public Examiner

Date field work completed: July 23, 1970
Date audit report signed: October 7, 1970

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ORGANIZATION

- Years Ended June 30, 1967, 1968, 1969, and 1970 -

	Address	Term From	Term To
Board:			
Dr. Herman Ahrenholz	Willmar	Apr. 13, 1962	Apr. 12, 1967
		Apr. 12, 1967	July 7, 1967*
		July 7, 1967	Apr. 12, 1972
Dr. Victor L. Marty	Minneapolis	Oct. 21, 1963	Apr. 12, 1968
		Apr. 12, 1968	Apr. 12, 1973
Dr. William F. Hynan	Saint Paul	July 30, 1964	Apr. 12, 1969
		Apr. 12, 1969	May 15, 1969*
Dr. Richard J. Kieffer	South Saint Paul	May 15, 1969	Apr. 12, 1974
Dr. Richard F. Scott	LeSueur	May 5, 1963	Apr. 12, 1970
		Apr. 12, 1970	Aug. 25, 1970*
Dr. August J. Schaub	Austin	May 26, 1966	Apr. 12, 1971
Officers:			
President -			
Dr. William F. Hynan		March 1966	March 1967
Dr. Richard F. Scott		March 1967	March 1968
Dr. Herman Ahrenholz		March 1968	March 1969
Dr. August J. Schaub		March 1969	March 1970
Dr. Richard F. Scott		March 1970	March 1971
Vice-President -			
Dr. Richard F. Scott		March 1966	March 1967
Dr. Herman Ahrenholz		March 1967	March 1968
Dr. August J. Schaub		March 1968	March 1969
Dr. Richard F. Scott		March 1969	March 1970
Dr. Herman Ahrenholz		March 1970	March 1971
Secretary-Treasurer -			
Dr. Victor L. Marty		March 1966	March 1967
		March 1967	March 1968
		March 1968	March 1969
		March 1969	March 1970
		March 1970	March 1971

*Continued in office

Public Examiner

EXHIBIT A

RECEIPTS AND DISBURSEMENTS

- Years Ended June 30, 1967, 1968, 1969, and 1970 -

	Year Ended June 30			
	1967	1968	1969	1970
Undisbursed Balance July 1	$ 22,574.78	$ 21,454.64	$ 16,036.35	$ 7,546.28
Receipts:				
Chiropractic license renewals	$ 14,310.00	$ 14,010.00	$ 14,060.00	$ 14,605.00
Basic science registrations	1,686.00	1,692.00	1,882.00	5,493.00
Examination fees	550.00	700.00	600.00	650.00
Duplicate license fees	5.00	5.00		5.00
Chiropractic corporation certificate fee				100.00
Refunds	3.00	3.00	1.00	
Gift from Minnesota Chiropractic Association				6,500.00
Total Receipts	$ 16,554.00	$ 16,410.00	$ 16,543.00	$ 27,353.00
Undisbursed Balance and Receipts	$ 39,228.78	$ 37,864.64	$ 32,579.35	$ 34,899.28
Disbursements:				
State Employee Services - Board members per diem	$ 1,375.00	$ 1,350.00	$ 1,425.00	$ 1,100.00
Salary of secretary-treasurer	4,800.00	4,800.00	4,800.00	4,800.00
Total State Employee Services	$ 6,175.00	$ 6,150.00	$ 6,225.00	$ 5,900.00
Other services -				
Rents and leases	$ 1,705.25	$ 1,657.49	$ 1,707.30	$ 1,766.31
Repairs	30.00		25.00	49.43
Bond		35.00	10.00	10.00
Printing and binding	766.31	768.14	1,012.98	36.95
Legal expense	6,123.87	10,273.23	12,469.18	21,814.49
Communications	637.67	582.15	821.62	858.34
Travel and subsistence	790.00	879.71	1,131.62	793.90
Freight and express	8.00	11.35	43.00	6.00
Other contractual services	56.50	61.31	104.44	111.00
Total Other Services	$ 10,117.60	$ 14,268.38	$ 17,325.14	$ 25,446.42

EXHIBIT A
Receipts and Disbursements
(Continued)

	Year Ended June 30			
	1967	1968	1969	1970
Disbursements: (Continued)				
Materials and supplies - Stationery and office supplies	$ 102.94	$ 132.81	$ 192.48	$ 137.16
Fixed charges - Retirement and social security	$ 446.40	$ 451.20	$ 460.80	$ 446.40
Acquisition of property - Educational equipment	$ 112.00			
Total Disbursements	$ 16,953.94	$ 21,002.39	$ 24,203.42	$ 31,929.98
Transfers:				
Transfer of 5% of gross receipts to General Fund	$ 820.20	$ 825.90	$ 829.65	$ 1,030.05
Total Disbursements and Transfers	$ 17,774.14	$ 21,828.29	$ 25,033.07	$ 32,960.03
Undisbursed Balance June 30	$ 21,454.64	$ 16,036.35	$ 7,546.28	$ 1,939.25

NAME PLEASE PRINT CLEARLY	ADDRESS STREET NUMBER, CITY & ZIP	TELEPHONE	REPRESENTING	CHECK HERE IF YOU WISH TO BE NOTIFIED WHEN EXAMINER'S FINDINGS ARE SUBMITTED TO AGENCY
Bob Fitzgerald		827 3583	International Chiropractors Assn 741 Brady St Davenport, Ia	
3007 Ludden Ct Apt 3, Minn 55408				

CHP-76-002-PE

STATE OF MINNESOTA
OFFICE OF HEARINGS EXAMINERS

FOR THE BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees.

REPORT OF HEARING EXAMINER

The above-entitled matter came on for hearing before Hearing Examiner Peter C. Erickson of the Minnesota Office of Hearing Examiners on June 30, 1976 at 1:30 p.m. in the Board Room of the Department of Health Building, Minneapolis, Minnesota.

Robert T. Holley, Special Assistant Attorney General, 717 Delaware Street S. E., MMinneapolis, Minnesota - 55440, appeared as counsel for the State Board of Chiropractic Examiners. E. I. Puckropp, Secretary-Treasurer of the Board, and Marie Anderson testified on behalf of the Board. The hearing continued until all interested groups or persons had an opportunity to be heard concerning the adoption of the proposed rules.

Pursuant to Minn. Stat. § 15.052, subd. 3 (1975 Supp.), this report will include Findings of Fact, Conclusions and Recommendations. The Board of Chiropractic Examiners and the Office of Hearing Examiners will make a copy of this Report available for review to any interested person upon request. Copies of the Report will be furnished at a nominal cost.

The Board shall, if it proposes to adopt the rules as originally proposed or amended, submit the complete hearing record to the Chief Hearing Examiner, pursuant to HE 108, no earlier than ten days subsequent to the receipt of this Report. It shall include the rules as originally proposed, and the rules as proposed for adoption in final form. The submission to the Chief Hearing Examiner shall precede review by the Attorney General. The Chief Hearing Examiner shall complete his review and submit his report to the Board on the issue of substantial changes in the rule within ten calendar days. The Board will be responsible

for filing the rules with the Attorney General.

Based upon the proceedings herein, the Examiner makes the following:

FINDINGS OF FACT

1. On April 28, 1976, the Board filed the following documents with the Chief Hearing Examiner:

(a) A proposed Order for Hearing;

(b) A proposed Notice of Hearing with the proposed rules attached; and

(c) A statement of the number of persons expected to attend and estimated length of hearing.

2. On May 26, 1976, the Board mailed the Notice of Hearing to all persons and associations who had registered their names with the Secretary of State for the purpose of receiving such notice, to all persons and associations on a list maintained by the Board of Chiropractic Examiners, and to all members of the Legislature.

3. On June 7, 1976, the Board filed with the Office of Hearings Examiners the following documents:

(a) The Order for Hearing;

(b) The Notice of Hearing as mailed;

(c) The affidavit of receipt of the Secretary of State's list;

(d) The Affidavit of Mailing;

(e) The Statement of Need;

(f) The affidavit of mailing of a notice pursuant to Minn. Stat. § 15.0412, subd. 6, a copy of the Notice and material received pursuant to the Notice.

(g) The names of Board personnel who will represent the agency.

(h) A summary of evidence.

(i) Department of Finance Approval.

The documents were available for inspection at the office of Hearings Examiners from the date of filing to the date of the hearing.

4. The record was closed after allowing 20 days for submission of written comments at the end of the day on July 20, 1976.

5. Statutory authority to promulgate the proposed rule is found in Minn. Stat. § 148.07, subd. 1 (1974), as amended by Minn. Laws 1976, Ch. 222, § 48, and in Minn. Laws 1976, Ch. 22, § 3.

6. The need to adopt this rule arises by reason of the Board's inability to fully meet, from total fees presently collected, its anticipated operating expenses for fiscal year 1977. Pursuant to Minn. Laws 1976, Ch. 222, § 3, such fees shall be adjusted in "a sufficient amount so that the total fees collected . . . will as closely as possible equal anticipated expenditures." Thus, unless fees are now increased, the Board will be without sufficient operating funds and unable to comply with the foregoing legislative directive.

7. As is demonstrated in the Fee Analysis Statement, the Board operated at a $5,000 deficit in fiscal year 1976. Without the proposed increase in renewal fees, said deficit would nearly triple in fiscal 1977. Thus, the amount of increase, dictated by legislative directive, is necessitated by the Board's present financial condition and expenditure and revenue estimates for fiscal year 1977. Moreover, because renewal fees must be paid by every licensed chiropractor and generate the largest source of Board revenue, limiting a fee increase at this time to license renewals only results in the most equitable distribution of the increase.

8. The proposed rule would not alter existing statutory monthly penalty fee amounts, the existing total maximum penalty fee, the current due date for the Board's receipt of license renewal payments, nor the Board's present responsibility to annually provide for due date notice. The sole change presented by the proposed rule is an increase in annual license renewal

fees, from $25 to $50, which, given the Board's current financial status, is necessary to fulfill the aforementioned new directives of the Legislature.

9. Dr. Bob Fitzgerald, a Minneapolis chiropractor, gave testimony alleging past misuse of funds and faulty record keeping by the Chiropractic Board. State audit reports and newspaper articles were submitted in support of these charges. Dr. Fitzgerald testified that it is the misuse of funds which has created the current financial position of the Board and that no increase in fees is justified. Marie Anderson, new financial advisor to the Board, testified that any past fund misuse and record-keeping problem the Board may have had is being corrected.

CONCLUSIONS

1. Due, timely and adequate legal notice of the hearing was properly served and filed by the Board of Chiropractic-Examiners. Although the 25-day filings (see HE 103) were filed two days late, no persons were prejudiced by the delay, as none requested an opportunity to review them, which is the purpose for the prefiling requirement. All other substantive and procedural requirements of statute or rule have been complied with.

2. The Examiner accepts the good-faith efforts of the Board to correct any financial problems it may have had and to continue operations in an appropriate manner.

3. The need for and reasonableness of the proposed rule have been demonstrated by the Board.

4. The Board has documented its statutory authority to promulgate the proposed rule.

RECOMMENDATION

That the Board of Chiropractic Examiners adopt the rule as proposed.

Dated this 28th day of July, 1976.

Peter C. Erickson

PETER C. ERICKSON
Hearing Examiner

STATE OF MINNESOTA
OFFICE OF HEARINGS EXAMINERS

FOR THE BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Proposed Adoption of a Rule of the State Board of Chiropractic Examiners Related to License Renewal Fees.

REPORT OF HEARING EXAMINER

The above-entitled matter came on for hearing before Hearing Examiner Peter C. Erickson of the Minnesota Office of Hearing Examiners on June 30, 1976 at 1:30 p.m. in the Board Room of the Department of Health Building, Minneapolis, Minnesota.

Robert T. Holley, Special Assistant Attorney General, 717 Delaware Street S. E., MMinneapolis, Minnesota - 55440, appeared as counsel for the State Board of Chiropractic Examiners. E. I. Puckropp, Secretary-Treasurer of the Board, and Marie Anderson testified on behalf of the Board. The hearing continued until all interested groups or persons had an opportunity to be heard concerning the adoption of the proposed rules.

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RECOMMENDATION

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Dated this 28th day of July, 1976.

Peter C. Erickson

PETER C. ERICKSON
Hearing Examiner